Statement of Basis

Tier I Operating Permit No. T1-2018.0013
Project ID 62002

Basic American Potato Company, Inc.
Blackfoot, Idaho

Facility ID 011-00012

Final

March 22, 2019
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Permit Writer

The purpose of this Statement of Basis is to set forth the legal and factual basis for the Tier I operating permit terms and conditions, including references to the applicable statutory or regulatory provisions for the terms and conditions, as required by IDAPA 58.01.01.362

1. ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

acfm	actual cubic feet per minute
AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
BAF	Basic American Foods – Blackfoot Plant
BAPCI	Basic American Potato Company, Inc.
Btu	British thermal unit
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
gr	grain (1 lb = 7,000 grains)
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
gpm	gallons per minute
HAP	hazardous air pollutants
hp	horsepower
IEDM	internal electronic data management
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pounds per hour
m	meter(s)
MACT	Maximum Achievable Control Technology
$\mu g/m^3$	micrograms per cubic meter
MMBtu	million British thermal units
MRRR	Monitoring, Recordkeeping and Reporting Requirements
NAICS	North American Industry Classification System
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO_2	nitrogen dioxide
NO_x	nitrogen oxides
NSPS	New Source Performance Standards
O&M	operations and maintenance
PC	permit condition
PM	particulate matter
PM_{10}	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppm	parts per million
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
Rules	Rules for the Control of Air Pollution in Idaho
scf	standard cubic feet
SIC	Standard Industrial Classification
SIP	State Implementation Plan

SM	Synthetic Minor
SO_2	sulfur dioxide
SO_x	sulfur oxides
TAP	toxic air pollutant
Tier I	Tier I operating permit
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

2. INTRODUCTION AND APPLICABILITY

Basic American Potato Company, Inc. (BAPCI) is a potato processing company, and is located at 409 West Collins Road, Blackfoot, Idaho.

Because Basic American Potato Company, Inc. and Basic American Foods – Blackfoot Plant (BAF) have the same owner, are adjacent, and have same first two digits of SIC, the two plants are considered as one Tier I source or Tier I facility , in accordance with IDAPA 58.01.01.006.40. The facility's classification is based on emissions from both plants.

The facility is classified as a major facility, as defined by IDAPA 58.01.01.008.10.c, because it emits or has the potential to emit criteria pollutants PM_{10}, NO_X, and CO above the major source threshold of 100 tons-per-year. As a major facility, BAPCI is required to apply for a Tier I operating permit renewal pursuant to IDAPA 58.01.01.301. At the time of this permitting action, the facility is not a major source of HAP emissions, as defined by IDAPA 58.01.01.008.10.a, because it does not have the potential to emit hazardous air pollutants above the major source thresholds of 10 tons-per-year for any single HAP and/or 25 tons-per-year for any combination of HAPs.

IDAPA 58.01.01.362 requires that as part of its review of the Tier I application, DEQ shall prepare a technical memorandum (i.e., statement of basis) that sets forth the legal and factual basis for the draft Tier I operating permit terms and conditions including reference to the applicable statutory provisions or the draft denial. This document provides the basis for the draft Tier I operating permit for BAPCI.

The format of this Statement of Basis follows that of the permit with the exception of the facility's information discussed first followed by the scope, the applicable requirements and permit shield, and finally the general provisions.

BAPCI's Tier I operating permit is organized into sections. They are as follows:

Section 1 – Acronyms, Units, and Chemical Nomenclature

The acronyms, units, and chemical nomenclature used in the permit are defined in this section.

Section 2 - Tier I Operating Permit Scope

The scope describes this permitting action.

Section 3 - Facility-Wide Conditions

The Facility-wide Conditions section contains the applicable requirements (permit conditions) that apply facility-wide. Where required, monitoring, recordkeeping and reporting requirements sufficient to assure compliance with each permit condition follows the permit condition.

Sections 4 through 7 – East and West Processing Boilers; Dryers; Material Transfer Operations, Flakers, and Peelers; and a Summary of Emission Rate Limits

The emissions unit-specific sections of the permit contain the applicable requirements that specially apply to each regulated emissions unit. Some requirements that apply to an emissions unit (e.g. opacity limits) may be contained in the facility-wide conditions. As with the facility-wide conditions, monitoring,

recordkeeping and reporting requirements sufficient to assure compliance with each applicable requirement immediately follows the applicable requirement.

Section 8 - General Provisions

The final section of the permit contains standard terms and conditions that apply to all major facilities subject to IDAPA 58.01.01.300. This section is the same for all Tier I facilities. The General Provisions have been reviewed by EPA and contain all terms and conditions required by IDAPA 58.01.01 et al as well as requirements from other air quality laws, rules and regulations. Each general provision has been paraphrased so it is more easily understood by the general public; however, there is no intent to alter the effect of the requirement. Should there be a discrepancy between a paraphrased general provision in this statement of basis and a rule or permit, the rule or permit shall govern.

3. FACILITY INFORMATION

3.1 Facility Description

In 2013, Basic American Foods acquired the potato dehydration facility located adjacent to its existing Blackfoot, ID facility. Basic American Foods now owns and operates the two facilities, located in Blackfoot, Idaho, which, as contiguous and adjacent properties, owned and operated by the same company are recognized by DEQ as a single facility, numbered 011-00012. However, Basic American Foods continues to permit the plants separately as Basic American Potato Co., Inc. (BAPCI) and Basic American Foods Blackfoot Facility (BAF).

This Tier I operating permit is for BAPCI, which is part of a potato processing facility that packs, processes, and dehydrates various potato products. BAPCI has three plants, all of which are contained within the same property boundary: Idaho Potato Packers, BAPCI Dehydrated, and BAPCI Processing.

- Idaho Potato Packers - a fresh potato facility where potatoes are washed, sorted, sized, and packaged.
- BAPCI Dehydrated - obtains potatoes from Idaho Potato Packers. Potatoes are peeled or not peeled, scrubbed, sorted, sliced or diced, wet sorted, blanched, and dried to form dehydrated potato pieces including slices, dices, strips, crush, and hash browns. Unacceptable wet and some unacceptable dried potatoes are taken to Nonpareil Processing.
- BAPCI Processing - produces dehydrated potato flakes, flour, and other flake and flour-based potato products. Potatoes may be peeled and are scrubbed, sorted, slabbed, precooked or not precooked, cooled, cooked, riced, and dried. Products are dried to 6% moisture and are broken up and ground to customer specifications, packaged or stored, and then sold. This is the site where the east and west boilers are located. The process also includes dryers, flakers, peelers, and baghouse equipment, which are also sources of emissions.

BAPCI uses the following drying equipment:

- Flakers: Flakers are for the conversion of materials from a liquid state to solid flakes in a single operation. This change of state is achieved by applying a film of the material to be flaked to the outer surface of a horizontal rotating steam drum. As the drum rotates, the water evaporates; the liquid film solidifies and is subsequently scraped from the drum surface and collected.
- Multi-Stage Dryers: These dyers incorporate a series of single-stage, multi-zone units. It is ideal for products with a high incoming moisture content, which would benefit from reorientation by transferring between conveyor belts at the ideal time in their drying cycle. Product bed depth and air flow vary between stages based on the product's drying curve. Discrete zones allow both air flow and temperature to be independently altered to maintain proper process parameters.

3.2 Facility Permitting History for BAPCI

Tier I Operating Permit History - Previous permit term January 29, 2016 to July 25, 2018.

The following information is the permitting history of this Tier I facility during the previous permit term which was from January 29, 2016 to July 25, 2018. This 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).

January 29, 2016	T1-2008.0077, Tier I operating permit , Permit Status (A), but will become (S) upon issuance of this permit.

Underlying Permit History - Includes every underlying permit issued to this facility

The following information is the comprehensive permitting history of all underlying applicable permits issued to this Tier I facility. This information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

August 5, 2002	T2-9811-169-2 was issued as an initial Tier II operating permit. Synthetic minor limits were established to limit the facility's potential to emit below the major source thresholds. (S)
May 9, 2007	P-050300 was issued to modify and replace the existing Tier II operating permit with a facility-wide permit to construct to establish limits for the use of residual oil and the use of emulsifiers in the boilers and to establish emission rates and modify throughput limits for potato processing. The facility was also reclassified as a major source of PM_{10}, SO_2, and NO_X emissions. (S)
June 13, 2008	P-2008.0057 was issued to modify and replace the existing permit to construct (P-050300). The permitting action was for replacing the existing east processing boiler with a new boiler. (S)
October 10, 2008	T1-2008.0077, initial Tier I Permit, Permit status (S)
September 13, 2010	P-2010.0057 PTC modification for adding a natural gas-fired 2 MMBtu/hr bin dryer and a natural gas-fired 3.3 MMBtu/hr room heater. (S)
September 13, 2010	T1-2008.0077 Project No. 60533 Tier I amendment to include the provisions of PTC P-2010.0057 issued on September 13, 2010 (S)
June 8, 2012	P-2010.0057 Project No. 61004, PTC revision for adding new equipment , such as Dryer No. 6 and removing old equipment, such as scratch and starch dryers. (S).
January 28, 2016	P-2010.0077 Project No. 61651, PTC modification for changing ownership from Nonpareil Corporation to Basic American Potato Company, Inc. and removing No. 2 fuel oil as a fuel option from east processing boiler, equipment that are not owned, or no longer in use by BAPCI, and permit conditions no longer applicable. (S)
January 29, 2016	T1-2008.0077, Project No. 61650 Tier I administrative amendment to include the provisions of PTC No. P-2010.0057 Project 61651. (A, will be S upon issuance of this permit).
September 14, 2018	P-2010.0057 Project No. 62080, PTC modification to remove Dehydration Air Dryer #5, Dehydration Air Dryer #6, and a Dryer #6 Air Makeup Unit. (A)

4. APPLICATION SCOPE AND APPLICATION CHRONOLOGY

4.1 Application Scope

This permit is the renewal of the facility's currently effective Tier I operating permit. This T1 permit renewal will also incorporate the removal of Dehydration Dryer #5 and #6, and Air Makeup Unit #6, as requested by the applicant.

4.2 Application Chronology

January 25, 2018	DEQ received an application.
March 26, 2018	DEQ determined that the application was complete.
December 14, 2018	DEQ made available the draft permit and statement of basis for peer and regional office review.
January 7, 2019	DEQ made available the draft permit and statement of basis for applicant review.
February 15 – March 18, 2019	DEQ provided a public comment period on the proposed action.
March 19, 2019	DEQ provided the proposed permit and statement of basis for EPA review.
March 22, 2019	DEQ issued the final permit and statement of basis.

5. EMISSIONS UNITS, PROCESS DESCRIPTION(S), AND EMISSIONS INVENTORY

This section lists the emissions units, describes the production or manufacturing processes, and provides the emissions inventory for this facility. The information presented was provided by the applicant in its permit application. Also listed in this section are the insignificant activities based on size or production rate.

5.1 Process No. 1 – East and West Processing Boilers

Table 5.1 lists the emissions units and control devices associated with East and West Processing Boilers.

Table 5.1 EMISSIONS UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION

Emissions Unit ID No.	Emissions Unit Description	Control Device (if applicable)	Emission Point ID No.
EU 01	East Processing Boiler Manufacturer: Nebraska Boiler Company Model: NS-C-50 Construction date: 1998 (NSPS) Design capacity: 53.4 MMBtu/hr Fuel types: natural gas	Low-NOX (30ppm) burner for natural gas	Exit height: 60.0 ft (18.29 m) Exit diameter: 2.30 ft (0.70 m) Exit flow rate: 9,397.24 acfm Exit temperature: 410 °F (483.15K)
EU 02	West Processing Boiler Manufacturer: Erie City Model: SA60H-21 Construction date: 1962 (non-NSPS) Design capacity: 40.5 MMBtu/hr Maximum operation: 8,760 hr/yr Fuel types: natural gas	None	Exit height: 60.0 ft (18.29 m) Exit diameter: 3.0 ft (0.91 m) Exit flow rate: 9,415.35 acfm Exit temperature: 410 °F (483.15K)

The primary purpose of the east and west processing boilers is to provide steam for processes. The west processing boiler was constructed in 1962 and relocated, but not modified, in 1992. The east processing boiler was constructed in 1998 and installed at the facility in 2008.

5.2 Process No. 2 - Dehydration

Table 5.2 lists the emissions units and control devices associated with the dryers.

Table 5.2 EMISSIONS UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION

Emissions Unit ID No.	Emissions Unit Description	Control Device (if applicable)	Emission Point ID No.
EU 20	Dehydration North Boiler Manufacturer: Highlander Model: 250-3 Manufacture Date: 1981 Heat input rating: 10.5 MMBtu/hr Fuel: Natural Gas Fuel consumption: 10,500 scf/hr for gas	None	Exit height: 28 ft (8.5 m) Exit diameter: 1.6 ft Exit flow rate: 2437 acfm Exit temperature: 320 °F
EU 21	Dehydration South boiler Manufacturer: Highlander Model: 200-3 Burner Model: Scotch Marine Manufacture Date: 1981 Heat input rating: 8.4 MMBtu/hr Fuel: Natural Gas Fuel consumption: 8,400 scf/hr	None	Exit height: 28 ft (8.5 m) Exit diameter: 3.0 ft Exit flow rate: 1950 acfm Exit temperature: 320 °F
EU 22 (1A) EU23(1B&1C)	Dehydration air dryer No. 1 Manufacturer: Proctor Model: NA Burner Model: Eclipse Manufacture Date: 1982 Heat input rating: Stage A = 6.4 MMBtu/hr Stage B = 2.8 MMBtu/hr Stage C = 2.8 MMBtu/hr Max. production: Stage A = 1,000 lb/hr Stage B&C = 1,000 lb/hr Fuel: Natural gas	None	Stage 1A Exit height: 36 ft (10.97 m) Exit diameter: 2.5 ft Exit flow rate: 12017 acfm Exit temperature: 187 °F Stage 1B&C Exit height: 30 ft (9.14 m) Exit diameter: 3 ft Exit flow rate: 8016 acfm Exit temperature: 150 °F
EU 24 (2A) EU25(2B&2C)	Dehydration air dryer No. 2 Manufacturer: Proctor Model: NA Burner Model: Eclipse Manufacture Date: 1982 Heat input rating: Stage A = 6.4 MMBtu/hr Stage B = 2.8 MMBtu/hr Stage C = 2.8 MMBtu/hr Max. production: Stage A = 1,000 lb/hr Stage B&C = 1,000 lb/hr Fuel: Natural gas	None	Stage 2A Exit height: 36 ft (10.97 m) Exit diameter: 2.5 ft Exit flow rate: 12017 acfm Exit temperature: 187 °F Stage 2B&C Exit height: 30 ft (9.14 m) Exit diameter: 3 ft Exit flow rate: 8016 acfm Exit temperature: 150 °F
EU 26 (3A) EU27(3B&3C)	Dehydration air dryer No. 3 Manufacturer: Proctor Model: NA Burner Model: Eclipse Manufacture Date: 1982 Heat input rating: Stage A = 6.4 MMBtu/hr Stage B = 2.8 MMBtu/hr Stage C = 2.8 MMBtu/hr Max. production: Stage A = 1,000 lb/hr Stage B&C = 1,000 lb/hr Fuel: Natural gas	None	Stage 3A Exit height: 36 ft (10.97 m) Exit diameter: 2.5 ft Exit flow rate: 12017 acfm Exit temperature: 187 °F Stage 3B&C Exit height: 30 ft (9.14 m) Exit diameter: 3 ft Exit flow rate: 8016 acfm Exit temperature: 150 °F
EU 34	Dehydration bin dryer Manufacturer: Nonpareil Model: NA	None	Exit height: 41.5 ft (12.65 m) Exit diameter: 1.4 ft (0.43 m) Exit flow rate: 554 acfm

Emissions Unit ID No.	Emissions Unit Description	Control Device (if applicable)	Emission Point ID No.
	Burner Model: Eclipse Manufacture Date: 2007 Heat input rating: 2 MMBtu/hr Max. production: 1,000 lb/hr output Fuel: Natural Gas		Exit temperature: 90 °F
EU 39	Dehydration research dryer Manufacturer: Carrier Model: OAC Burner Model: Maxon Manufacture Date: 1990 Heat input rating: 0.88 MMBtu/hr Max. production: 125 lb/hr output Fuel: Natural gas	None	Exit height: 24 ft (7.3 m) Exit diameter: 0.5 ft Exit flow rate: 70.2 acfm Exit temperature: 95 °F

This section of the permit regulates the dryers and a bin dryer of the dehydrated piece line and a research dryer for the research and development line. These dryers have emissions from both fuel burning and potato particulate.

The dehydrated piece line cuts and dries potatoes using a steam peeler, the dryers with three stages each, and a bin dryer.

The research and development line consists of a small processing line. The emissions from the dehydration research dryer are ducted through a cyclone.

5.3 Process No. 3 – Material Transfer Operations, Flakers, and Peelers

Table 5.3 lists the emissions units and control devices associated with Material Transfer Operations, Flakers, and Peelers.

Table 5.3 EMISSIONS UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION

Emissions Unit ID No.	Emissions Unit Description	Control Device (if applicable)	Emission Point ID No.
EU 35	Wet area air makeup Manufacturer: Hartzell Heat input rating: 3.5 MMBtu/hr Fuel: Natural gas	None	Exit height: 32.8 ft (10 m) Horizontal dimension: 2.3 ft (0.71 m) Vertical dimension: 7.7 ft (2.34 m)
EU 36	South dryer room air makeup Manufacturer: Hartzell Heat input rating: 5 MMBtu/hr Fuel: Natural gas	None	Exit height: 32.8 ft (10 m) Horizontal dimension: 2.3 ft (0.71 m) Vertical dimension: 7.7 ft (2.34 m)
EU 37	South dryer room roof air makeup Manufacturer: Hartzell Heat input rating: 5 MMBtu/hr Fuel: Natural gas	None	Exit height: 32.8 ft (10 m) Horizontal dimension: 2.3 ft (0.71 m) Vertical dimension: 7.7 ft (2.34 m)
EU 38	Inspection room roof air makeup Manufacturer: Hartzell Heat input rating: 3.5 MMBtu/hr Fuel: Natural gas	None	Exit height: 32.8 ft (10 m) Horizontal dimension: 2.3 ft (0.71 m) Vertical dimension: 7.7 ft (2.34 m)
EU 68	Room Heater Manufacturer: Concept Designs Heat input rating: 3.3 MMBtu/hr Fuel: Natural gas	None	NA (Volume source)

Emissions Unit ID No.	Emissions Unit Description	Control Device (if applicable)	Emission Point ID No.
EU 40	Packaging material transfer	Packaging baghouse No. 1 Manufacturer: Mikropulsaire No. of bags: 9 Bags Flowrate: 630 cfm PM_{10} control efficiency: 99%	Exit height: 20 ft (6.1 m) Exit diameter: 0.5 ft Exit flow rate: 630 acfm Exit temperature: 70 °F
EU 41	Packaging material transfer	Packaging baghouse No. 2 Manufacturer: Mikropulsaire No. of bags: 25 Bags Flowrate: 1,750 cfm PM_{10} control efficiency: 99%	Exit height: 20 ft (6.1 m) Exit diameter: 0.5 ft Exit flow rate: 1744 acfm Exit temperature: 70 °F
EU 42	Crush-room material transfer	Crush-room baghouse No. 1 Manufacturer: Mikropulsaire No. of bags: 9 Bag Flowrate: 630 cfm PM_{10} control efficiency: 99%	Exit height: 16 ft (4.88 m) Effective diameter: 0.003 ft Exit flow rate: 0.05 acfm Exit temperature: 70 °F
EU 43	Crush-room material transfer	Crush-room baghouse No. 2 Manufacturer: Mikropulsaire No. of bags: 25 Bag Flowrate: 1,750 cfm PM_{10} control efficiency: 99%	Exit height: 16 ft (4.88 m) Effective diameter: 0.003 ft Exit flow rate: 0.05 acfm Exit temperature: 70 °F
EU 44	Dehydration steam peeler Manufacturer: Odenberg Max. production: 5,000 lb/hr output	None	Exit height: 24 ft (7.3 m) Exit diameter: 2 ft Exit flow rate: 56.6 acfm Exit temperature: 190 °F
EU 35	Wet area air makeup Manufacturer: Hartzell Heat input rating: 3.5 MMBtu/hr Fuel: Natural gas	None	Exit height: 32.8 ft (10 m) Horizontal dimension: 2.3 ft (0.71 m) Vertical dimension: 7.7 ft (2.34 m)
EU 36	South dryer room air makeup Manufacturer: Hartzell Heat input rating: 5 MMBtu/hr Fuel: Natural gas	None	Exit height: 32.8 ft (10 m) Horizontal dimension: 2.3 ft (0.71 m) Vertical dimension: 7.7 ft (2.34 m)
EU 37	South dryer room roof air makeup Manufacturer: Hartzell Heat input rating: 5 MMBtu/hr Fuel: Natural gas	None	Exit height: 32.8 ft (10 m) Horizontal dimension: 2.3 ft (0.71 m) Vertical dimension: 7.7 ft (2.34 m)

This section regulates potato material transfer operations, flakers, and peelers, which have potato particulate emissions and no emissions from fuel combustion.

Potato material is transferred from one process to another pneumatically. Baghouses are used to control particulate emissions from these processes. A list of the processes and the corresponding baghouses are shown in Table 5.3.

The flake line uses a processing peeler to peel potatoes. The potatoes are then processed and sent to the flakers. The potato material is then conveyed to grinding circuits No. 1 and No. 2.

The crush line grinds off-spec potato material. Emission sources are through two crush-room baghouses.

5.4 Emissions Inventory

Table 5.4 summarizes the emissions inventory for this major facility. All values are expressed in units of tons-per-year and represent the facility's potential to emit. Potential to emit is 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 hour 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 emission is state or federally enforceable.

Listed below in Table 5.4 are the estimated emissions. The documentation provided by the applicant for the emissions inventory and emission factors is provided in the Statement of Basis, Appendix C, Alternative Compliance Plan, of PTC No. P-2009.0043, issued July 27, 2018; in the Statement of Basis Appendix A, BAPCI Emission inventory of PTC No. P-2010.0057, issued September 14, 2018; and in the emission inventory found in Appendix A of this document.

Table 5.4 EMISSIONS INVENTORY - POTENTIAL TO EMIT (T/yr)

Source Description	PM_{10} T/yr	NO_x T/yr	SO_2 T/yr	CO T/yr	VOC T/yr	Lead T/yr
Total BAPCI Point Sources	78.1	49.9	0.4	58.8	3.9	3.46E-04
Total BAF Point Sources	94.2	77.6	18.2	240.6	7.7	9.39E-04
Total Fugitive Source	4.3	16.7	0.4	14.0	0.9	8.33E-05

6. EMISSIONS LIMITS AND MRRR

This section contains the applicable requirements for this T1 facility.

This section is divided into the following subsections:

- Facility-Wide Conditions;
- East and West Processing Boilers Emissions Limits;
- Dryers Emissions Limits;
- Material Transfer Operations, Flakers, and Peelers Emissions Limits; and
- Tier I Operating Permit General Provisions.

MRRR

Monitoring, recordkeeping and reporting requirements (MRRR) are the means with which compliance with an applicable requirement is demonstrated. In this section, the applicable requirement (permit condition) is provided first followed by the MRRR. Should an applicable requirement not include sufficient MRRR to satisfy IDAPA 58.01.01.322.06, 07, and 08, then the permit must establish adequate monitoring, recordkeeping and reporting sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the permit (i.e. gap filling). In addition to the specific MRRR provided for each applicable requirement, generally applicable facility-wide conditions and general provisions may also be provided, such as performance testing, reporting, and certification requirements.

The legal and factual basis for each permit condition is provided for in this document. If a permit condition was changed due to facility draft comments or public comments, an explanation of the changes is provided.

State Enforceability

An applicable requirement that is not required by the federal CAA and has not been approved by EPA as a SIP-approved requirement is identified as a "State-only" requirement and is enforceable only under state law. State-only requirements are not enforceable by the EPA or citizens under the CAA. State-only requirements are identified in the permit within the citation of the legal authority for the permit condition.

Federal Enforceability

Unless identified as "State-only," all applicable requirements, including MRRR, are state and federally enforceable. It should be noted that while a violation of a MRRR is a violation of the permit, it is not necessarily a violation of the underlying applicable requirement (e.g. emissions limit).

To minimize the length of this document, the following permit conditions and MRRR have been paraphrased. Refer to the permit for the complete requirements.

6.1 Facility-Wide Conditions

Permit Condition 3.1 - Fugitive Dust

All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651.

[IDAPA 58.01.01.650-651, 3/30/07]

MRRR (Permit Conditions 3.2 through 3.4)

- Monitor and maintain records of the frequency and the methods used to control fugitive dust emissions;
- Maintain records of all fugitive dust complaints received and the corrective action taken in response to the complaint; and
- Conduct facility-wide inspections of all sources of fugitive emissions. If any of the sources of fugitive dust are not being reasonably controlled, corrective action is required.

[IDAPA 58.01.01.322.06, 07, 08, 4/5/2000]

Permit Condition 3.5 - Odors

The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

[IDAPA 58.01.01.775-776 (State-only), 5/1/94]

MRRR (Permit Condition 3.6)

- Maintain records of all odor complaints received and the corrective action taken in response to the complaint; and
- Take appropriate corrective action if the complaint has merit, and log the date and corrective action taken.

[IDAPA 58.01.01.322.06, 07 (State only), 5/1/94]

Permit Condition 3.7 - Visible Emissions

The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.

[IDAPA 58.01.01.625, 4/5/00]

MRRR (Permit Condition 3.8 through 3.9)

- Conduct facility-wide inspections of all emissions units subject to the visible emissions standards (or rely on continuous opacity monitoring);
- If visible emissions are observed, take appropriate corrective action and/or perform a Method 9 opacity test; and
- Maintain records of the results of each visible emissions inspection.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

Permit Conditions 3.10 through 3.14 - Excess Emissions

The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions. The provisions of IDAPA 58.01.01.130-136 shall govern in the event of conflicts between the excess emissions facility wide conditions and the regulations of IDAPA 58.01.01.130-136.

[IDAPA 58.01.01.130-136, 4/5/00]

MRRR (Permit Conditions 3.11 through 3.14)

- Take appropriate action to correct, reduce, and minimize emissions from excess emissions events;

- Prohibit excess emissions during any DEQ Atmospheric Stagnation Advisory or Wood Stove Curtailment Advisory; and
- Notify DEQ of each excess emissions events as soon as possible, including information regarding upset, breakdown, or safety events.
- Submit a report for each excess emissions event to DEQ; and
- Maintain records of each excess emissions event.

[IDAPA 58.01.01.130-136, 4/5/00]

Permit Condition 3.15 – Fuel-Burning Equipment PM Standards

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

[IDAPA 58.01.01.676-677, 5/1/94]

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 3.16 - Open Burning

The permittee shall comply with the *Rules for Control of Open Burning*, IDAPA 58.01.01.600-623.

[IDAPA 58.01.01.600-623, 5/08/09]

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 3.17 - Asbestos

The permittee shall comply with all applicable requirements of 40 CFR 61, Subpart M—"National Emission Standard for Asbestos."

[40 CFR 61, Subpart M]

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 3.18 - Accidental Release Prevention

(a)

An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, shall comply with the requirements of the Chemical Accident Prevention Provisions at 40 CFR 68 no later than the latest of the following dates:

- Three years after the date on which a regulated substance present above a threshold quantity is first listed under 40 CFR 68.130.
- The date on which a regulated substance is first present above a threshold quantity in a process.

[40 CFR 68.10 (a)]

(b)

This facility is subject to 40 CFR Part 68 and shall certify compliance with all requirements of 40 CFR Part 68, including the registration and submission of the RMP, as part of the annual compliance certification required by 40 CFR 70.6(c)(5).

[40 CFR 68.215(a)(2); IDAPA 58.01.01.322.11, 4/6/05; 40 CFR 68.215(a)(ii)]

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 3.19 - Recycling and Emissions Reductions

The permittee shall comply with applicable standards for recycling and emissions reduction of refrigerants and their substitutes pursuant to 40 CFR 82, Subpart F, Recycling and Emissions Reduction.

[40 CFR 82, Subpart F]

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 3.20- NSPS General Provisions

BAPCI is subject to NSPS Subpart Dc, and is therefore required to comply with applicable General Provisions.

[40 CFR 60, Subpart A]

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 3.21 - Monitoring and Recordkeeping

The permittee shall maintain sufficient records to assure compliance with all of the terms and conditions of this operating permit. Records of monitoring information shall include, but not be limited to, the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Conditions 3.22 through 3.25 - Performance Testing

If performance testing is required, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test or shorter time period as provided in a permit, order, consent decree, or by DEQ approval. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests such testing not be performed on weekends or state holidays.

All testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, prior to conducting any performance test, the permittee is encouraged to submit in writing to DEQ, at least 30 days in advance, the following for approval:

- The type of method to be used;
- Any extenuating or unusual circumstances regarding the proposed test; and
- The proposed schedule for conducting and reporting the test.

[IDAPA 58.01.01.157, 4/5/00; IDAPA 58.01.01.322.06, 08.a, 09, 5/1/94]

MRRR (Permit Conditions 3.22 through 3.25)

The permittee shall submit compliance test report(s) to DEQ following testing.

[IDAPA 58.01.01.157, 4/5/00; IDAPA 58.01.01.322.06, 08.a, 09, 5/1/94]

Permit Condition 3.26 - Reports and Certifications

This permit condition establishes generally applicable MRRR for submittal of reports, certifications, and notifications to DEQ and/or EPA as specified.

[IDAPA 58.01.01.322.08, 11, 5/1/94]

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 3.27 - Incorporation of Federal Requirements by Reference

Unless expressly provided otherwise, any reference in this permit to any document identified in IDAPA 58.01.01.107.03 shall constitute the full incorporation into this permit of that document for the purposes of the reference, including any notes and appendices therein.

[IDAPA 58.01.01.107, 4/7/11]

MRRR

No specific monitoring is required for this facility-wide condition. As with all permit conditions, the permittee must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

6.2 Emissions Unit-Specific Emissions Limits and MRRR

The permit has been updated using the current permit template. The permit also has been modified for incorporating the underlying PTC No. P-2010.0057 Project 62080 issued on September 14, 2018. Refer to the underlying PTC for more details.

East and West Processing Boilers Emission Limits and MRR

Permit Condition 4.1 –Emission Limits

The emissions from the East and West Processing Boiler stacks shall not exceed any corresponding emissions rate limits listed in Table 4.3.

Table 4.3 East and West Processing Boiler Emission Limits [a]

Source Description	$PM_{2.5}/PM_{10}$ [b]	
	lb/hr [c]	T/yr [d]
East processing boiler	0.4	1.74
West processing boiler	0.30	1.32

a) In absence of any other credible evidence, compliance is ensured by complying with permit operating, monitoring, and record keeping requirements.
b) Particulate matter with an aerodynamic diameter less than or equal to a nominal two point five (2.5) and ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.
c) Pounds per hour, as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference test method, continuous emission monitoring system (CEMS) data, or DEQ-approved alternative.
d) Tons per any consecutive 12-calendar month period.

MRRR- (Permit Conditions 4.2 and 4.3)

The east and west processing boilers are permitted to burn natural gas only, and No. 2 fuel oil as a fuel option has been removed from the west boiler. This was reported in section 3 of the Alternate PM10 Compliance Plan for the Blackfoot Facility of Basic American Foods provided to DEQ August 4, 2017, (DEQ document number 2017AAG1588). The underlying PTC No. P-2010.0057 Project 62001 was processed as per IDAPA 58.01.01.2095(a) to reflect the change which is also being incorporated into the Tier I operating permit. Also, a boiler operations and maintenance manual developed and shall be kept on-site and made available DEQ.

MRRR- (Permit Condition 4.4)

The PM_{10} emission limits for the west boiler was revised to reflect the boiler can only burn natural gas. MRRR remains the same. The requirements in 40 CFR 60 Subpart Dc that only apply to boilers burning fuel oil were removed. Also, 40 CFR 63 Subpart JJJJJJ is no longer applicable because the boilers burn only natural gas.

Dryers

Permit Condition 5.1 and Table 7.1- PM Emission Limits

The PM_{10} emissions from any dryer stack listed in Table 7.1 shall not exceed the corresponding emissions rate limits listed in the table.

MRRR- (Permit Conditions 5.2 through 5.4)

The BAF August, 2010 Alternate Compliance Plan found in Appendix C of the SOB for PTC No. P-2009.0043, issued July 27, 2018, indicated Dehydration Dryer No. 1 (emission point sources EU 22 and EU23) was being removed from service. Instead, the applicant decided to leave Dehydration Dryer #1 intact (emission point sources EU 31, 32, and 33) and remove Dehydration Air Dryer Nos. 5 (emission point sources EU 31, 32, and 33) and Dehydration Air Dryer No. 6 (emission point sources EU 45, 46, and 47), which were removed from underlying PTC Permit No. P-2010.0057, September 14, 2018, in DEQ Project 62080. A previous permit condition with a stack height requirement for the 5B and 5C dehydration dryers and the dehydration bin dryer exhaust to be at least 41 feet and 4 inches was removed because Dryers 5B and 5C were physically removed from the plant and the dehydration bin dryer is not connected to this stack. These changes are being incorporated into this Tier I operating permit according to IDAPA 58.01.01.209.05.a.

Dryer operating throughput limits have been established to ensure compliance with emission limits in Table 7.1. Monitoring and recordkeeping shall be done for sources listed in Table 5.3 according to permit condition 5.4 and shall be made available to DEQ upon request.

Permit Condition 5.2 – Opacity Limit

Emissions from any Dryer stacks, or any other stack, vent, or functionally equivalent opening associated with the Dryers, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

MRRR - (Permit Condition 3.7 through 3.9)

The permittee shall conduct a schedule of no less frequently than quarterly. If visible emissions are present, appropriate corrective action shall be taken and an additional check within 24 hours to determine that the visible emissions have been eliminated. Records shall be maintained including, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present, any corrective action taken, and the date of the corrective action.

Material Transfer Operations, Flakers, and Peelers

Permit Condtion 6.1 and Table 7.1– Emission Limits

The PM_{10} emissions from any stack, baghouse, flaker, peeler, or cyclone listed in Table 7.1 shall not exceed the corresponding emissions rate limits listed in the table.

MRRR – (Permit Condition 6.3 through 6.7)

The permittee shall use a baghouse to controll material transfer particulate emissions, as identified in Table 6.1. The permittee shall monitor pressure differential across each air pollution control device and operate and maintain them according to manufacturer and O&M Manual specifications. The O&M Manual shall be available on site at all times and be made available to DEQ upon request. The throughput data shall be monitored and recorded daily. Annual throughput shall be calculated and recorded monthly.

Permit Condition 5.2 – Opacity Limit

Emissions from any Dryer stacks, or any other stack, vent, or functionally equivalent opening associated with the Dryers, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

MRRR - (Permit Condition 3.7 through 3.9)

The permittee shall conduct a schedule of no less frequently than quarterly. If visible emissions are present, appropriate corrective action shall be taken and an additional check within 24 hours to determine that the visible emissions have been eliminated. Records shall be maintained including, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time.

Summary of Emission Rate Limits

Table 7.1 is revised to reflect the changes made in the underlying PTC No. P 2010.0057 Project 62080 issued on September 14, 2018.

6.3 General Provisions

Unless expressly stated, there are no MRRR for the general provisions.

General Compliance, Duty to Comply

The permittee must comply with the terms and conditions of the permit.

[IDAPA 58.01.01.322.15.a, 5/1/94; 40 CFR 70.6(a)(6)(i)]

General Compliance, Need to Halt or Reduce Activity Not a Defense

The permittee cannot use the fact that it would have been necessary to halt or reduce an activity as a defense in an enforcement action.

[IDAPA 58.01.01.322.15.b, 5/1/94; 40 CFR 70.6(a)(6)(ii)]

General Compliance, Duty to Supplement or Correct Application

The permittee must promptly submit such supplementary facts or corrected information upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application. The permittee must also provide information as necessary to address any new requirements that become applicable after the date a complete application has been filed but prior to the release of a draft permit.

[IDAPA 58.01.01.315.01, 5/1/94; 40 CFR 70.5(b)]

Reopening, Additional Requirements, Material Mistakes, Etc.

This term lists the instances when the permit must be reopened and revised, including times when additional requirements become applicable, when the permit contains mistakes, or when revision or revocation is necessary to assure compliance with applicable requirements.

[IDAPA 58.01.01.322.15.c, 5/1/94; IDAPA 58.01.01.386, 3/19/99; 40 CFR 70.7(f)(1), (2); 40 CFR 70.6(a)(6)(iii)]

Reopening, Permitting Actions

This term discusses modification, revocation, reopening, and/or reissuance of the permit for cause. If the permittee files a request to modify, revoke, reissue, or terminate the permit, the request does not stay any permit condition, nor does notification of planned changes or anticipated noncompliance.

[IDAPA 58.01.01.322.15.d, 5/1/94; 40 CFR 70.6(a)(6)(iii)]

Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege.

[IDAPA 58.01.01.322.15.e, 5/1/94; 40 CFR 70.6(a)(6)(iv)]

Information Requests

The permittee must furnish, within a reasonable time to DEQ, any information, including records required by the permit, that is requested in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.

[Idaho Code §39-108; IDAPA 58.01.01.122, 4/5/00; IDAPA 58.01.01.322.15.f, 4/5/00; 40 CFR 70.6(a)(6)(v)]

Information Requests, Confidential Business Information

Upon request, the permittee must furnish to DEQ copies of records required to be kept by this permit. For information claimed to be confidential, the permittee may furnish such records along with a claim of confidentiality in accordance with Idaho Code §9-342A and applicable implementing regulations including IDAPA 58.01.01.128.

[IDAPA 58.01.01.322.15.g, 5/1/94; IDAPA 58.01.01.128, 4/5/00; 40 CFR 70.6(a)(6)(v)]

Severability

If any provision of the permit is held to be invalid, all unaffected provisions of the permit will remain in effect and enforceable.

[IDAPA 58.01.01.322.15.h, 5/1/94; 40 CFR 70.6(a)(5)]

Changes Requiring Permit Revision or Notice

The permittee may not commence construction or modification of any stationary source, facility, major facility, or major modification without first obtaining all necessary permits to construct or an approval under IDAPA 58.01.01.213, or complying with IDAPA 58.01.01.220 through 223. The permittee must comply with IDAPA 58.01.01.380 through 386 as applicable.

[IDAPA 58.01.01.200-223, 4/2/08; IDAPA 58.01.01.322.15.i, 3/19/99; IDAPA 58.01.01.380-386, 7/1/02; 40 CFR 70.4(b)(12), (14), (15), and 70.7(d), (e)]

Changes that are not addressed or prohibited by the Tier I operating permit require a Tier I operating permit revision if such changes are subject to any requirement under Title IV of the CAA, 42 U.S.C. Section 7651 through 7651c, or are modifications under Title I of the CAA, 42 U.S.C. Section 7401 through 7515. Administrative amendments (IDAPA 58.01.01.381), minor permit modifications (IDAPA 58.01.01. 383), and significant permit modifications (IDAPA 58.01.01.382) require a revision to the Tier I operating permit. IDAPA 58.01.01.502(b)(10) changes are authorized in accordance with IDAPA 58.01.01.384. Off permit changes and required notice are authorized in accordance with IDAPA 58.01.01.385.

[IDAPA 58.01.01.381-385, 7/1/02; IDAPA 58.01.01.209.05, 4/11/06; 40 CFR 70.4(b)(14) and (15)]

Federal and State Enforceability

All permit conditions are federally enforceable unless specified in the permit as a state or local only requirement. State and local only requirements are not required under the CAA and are not enforceable by EPA or by citizens.

[IDAPA 58.01.01.322.15.j, 5/1/94; IDAPA 58.01.01.322.15.k, 3/23/98; Idaho Code §39-108; 40 CFR 70.6(b)(1), (2)]

Inspection and Entry

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

- Enter upon the permittee's premises where a Tier I source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;
- Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
- Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
- As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108; IDAPA 58.01.01.322.15.l, 5/1/94; 40 CFR 70.6(c)(2)]

New Applicable Requirements

The permittee must continue to comply with all applicable requirements and must comply with new requirements on a timely basis.

[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.10.a.ii, 5/1/94; 40 CFR 70.6(c)(3) citing 70.5(c)(8)]

Fees

The owner or operator of a Tier I source shall pay annual registration fees to DEQ in accordance with IDAPA 58.01.01.387 through IDAPA 58.01.01.397.

[IDAPA 58.01.01.387, 4/2/03; 40 CFR 70.6(a)(7)]

Certification

All documents submitted to DEQ shall be certified in accordance with IDAPA 58.01.01.123 and comply with IDAPA 58.01.01.124.

[IDAPA 58.01.01.322.15.o, 5/1/94; 40 CFR 70.6(a)(3)(iii)(A); 40 CFR 70.5(d)]

Renewal

The permittee shall submit an application to DEQ for a renewal of this permit at least six months before, but no earlier than 18 months before, the expiration date of this operating permit. To ensure that the term of the operating permit does not expire before the permit is renewed, the owner or operator is encouraged to submit a renewal application nine months prior to the date of expiration.

[IDAPA 58.01.01.313.03, 4/5/00; 40 CFR 70.5(a)(1)(iii)]

If a timely and complete application for a Tier I operating permit renewal is submitted, but DEQ fails to issue or deny the renewal permit before the end of the term of this permit, then all the terms and conditions of this permit including any permit shield that may have been granted pursuant to IDAPA 58.01.01.325 shall remain in effect until the renewal permit has been issued or denied.

[IDAPA 58.01.01.322.15.p, 5/1/94; 40 CFR 70.7(b)]

Permit Shield

Compliance with the terms and conditions of the Tier I operating permit, including those applicable to all alternative operating scenarios and trading scenarios, shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:

- Such applicable requirements are included and are specifically identified in the Tier I operating permit; or
    - DEQ has determined that other requirements specifically identified are not applicable and all of the criteria set forth in IDAPA 58.01.01.325.01(b) have been met.
- The permit shield shall apply to permit revisions made in accordance with IDAPA 58.01.01.381.04 (administrative amendments incorporating the terms of a permit to construct), IDAPA 58.01.01.382.04 (significant modifications), and IDAPA 58.01.01.384.03 (trading under an emissions cap).
- Nothing in this permit shall alter or affect the following:
    - Any administrative authority or judicial remedy available to prevent or terminate emergencies or imminent and substantial dangers;
    - The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
    - The applicable requirements of the acid rain program, consistent with 42 U.S.C. Section 7651(g)(a); and
    - The ability of EPA to obtain information from a source pursuant to Section 114 of the CAA; or the ability of DEQ to obtain information from a source pursuant to Idaho Code §39-108 and IDAPA 58.01.01.122.

[Idaho Code §39-108 and 112; IDAPA 58.01.01.122, 4/5/00; IDAPA 58.01.01.322.15.m, 325.01, 5/1/94; IDAPA 58.01.01.325.02, 3/19/99; IDAPA 58.01.01.381.04, 382.04, 383.05, 384.03, 385.03, 3/19/99; 40 CFR 70.6(f)]

Compliance Schedule and Progress Reports

- For each applicable requirement for which the source is not in compliance, the permittee shall comply with the compliance schedule incorporated in this permit.
- For each applicable requirement that will become effective during the term of this permit and that provides a detailed compliance schedule, the permittee shall comply with such requirements in accordance with the detailed schedule.
- For each applicable requirement that will become effective during the term of this permit that does not contain a more detailed schedule, the permittee shall meet such requirements on a timely basis.

- For each applicable requirement with which the permittee is in compliance, the permittee shall continue to comply with such requirements.

[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.9, 5/1/94; IDAPA 58.01.01.314.10, 4/5/00; 40 CFR 70.6(c)(3) and (4)]

Periodic Compliance Certification

The permittee shall submit compliance certifications during the term of the permit for each emissions unit to DEQ and the EPA as specified.

- Compliance certifications for all emissions units shall be submitted annually unless otherwise specified.
- All original compliance certifications shall be submitted to DEQ and a copy of all compliance certifications shall be submitted to the EPA.

[IDAPA 58.01.01.322.11, 4/6/05; 40 CFR 70.6(c)(5)(iii) as amended, 62 Fed. Reg. 54900, 54946 (10/22/97); 40 CFR 70.6(c)(5)(iv)]

False Statements

The permittee may not make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

No Tampering

The permittee may not render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

Semiannual Monitoring Reports.

In addition to all applicable reporting requirements identified in this permit, the permittee shall submit reports of any required monitoring at least every six months as specified.

[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.322.08.c, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

Reporting Deviations and Excess Emissions

Each and every applicable requirement, including MRRR, is subject to prompt deviation reporting. Deviations due to excess emissions must be reported in accordance Sections 130-136. All instances of deviation from Tier I operating permit requirements must be included in the deviation reports. The reports must describe the probable cause of the deviation and any corrective action or preventative measures taken. Deviation reports must be submitted at least every six months unless the permit specifies a different time period as required by IDAPA 58.01.01.322.08.c. Examples of deviations include, but are not limited to, the following:

- Any situation in which an emissions unit fails to meet a permit term or condition;
- Emission control device does not meet a required operating condition;
- Observations or collected data that demonstrate noncompliance with an emissions standard; and
- Failure to comply with a permit term that requires a report.

[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.135, 4/11/06; 40 CFR 70.6(a)(3)(iii)]

Permit Revision Not Required, Emissions Trading

No permit revision will be required, under any approved, economic incentives, marketable permits, emissions trading, and other similar programs or processes, for changes that are provided for in the permit.

[IDAPA 58.01.01.322.05.b, 4/5/00; 40 CFR 70.6(a)(8)]

Emergency

In accordance with IDAPA 58.01.01.332, an "emergency" as defined in IDAPA 58.01.01.008, constitutes an affirmative defense to an action brought for noncompliance with such technology-based emissions limitation if the conditions of IDAPA 58.01.01.332.02 are met.

[IDAPA 58.01.01.332.01, 4/5/00; 40 CFR 70.6(g)]

7. REGULATORY REVIEW

7.1 Attainment Designation (40 CFR 81.313)

The facility is located in Bingham which is designated as attainment or unclassifiable for PM_{10}, $PM_{2.5}$, CO, NO_x, SO_2, and Ozone. Reference 40 CFR 81.313.

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

Post project facility-wide emissions from this facility have a potential to emit greater than 100 tons per year for PM2.5, PM10, NOx, and CO as demonstrated in the Emissions Inventories section of this analysis. Therefore, this facility is classified as a major facility as defined in IDAPA 58.01.01.008.10.

7.3 PSD Classification (40 CFR 52.21)

In 2013, Basic American Foods acquired the potato dehydration facility located adjacent to its existing Blackfoot, ID facility. Basic American Foods now owns and operates the two facilities, located in Blackfoot, Idaho, which, as contiguous and adjacent properties, owned and operated by the same company are recognized by DEQ as a single facility, numbered 011-00012. (However, Basic American Foods continues to permit the plants separately as Basic American Potato Co., Inc. (BAPCI) and Basic American Foods Blackfoot Facility (BAF).)

The facility was a major source as defined in 40 CFR 52.21(b) ("PSD Major Source") because total installed boiler capacity exceeded 250 MMBtu/hr and because emissions of some criteria air pollutants exceed 100 ton/yr.

With the installation of Boiler 2A at BAF and the retirement of Boilers 1and 2 BAF, facility-wide boiler capacity is less than 250 MMBtu/hr, and the only criteria air pollutant with emissions exceeding 250 ton/yr would be carbon monoxide. Thus, by creating an enforceable limit of 195 ton/yr on facility-wide carbon monoxide, the facility was no longer considered to be a PSD major source when PTC P-2017.0031 was issued September 12, 2017. Further, as documented in Section 4 of the application for initial PTC P-2017.0031, the changes in emissions associated with that project, Project No. 61894, were less than the "Significant" emission increase levels identified in IDAPA 58.01.01.006.106.

7.4 NSPS Applicability (40 CFR 60)

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

The East Processing Boiler is subject to this subpart. The boilers only combusts natural gas as fuel. Therefore, the only sections of this subpart that are applicable to the boiler are the Applicability and Delegation of Authority specified in 40 CFR 60.40c(a), the Recordkeeping requirements of 40 CFR 60.48c(g)(1)-(3), (i) and the Reporting requirements of 40 CFR 60.48c(a), (j).

While the East Processing Boiler continues being subject to 40 CFR 60 Subpart Dc, these requirements could apply to the West Processing Boiler because though it was built in 1962, it has been retrofitted from a dual-fired distillate oil and natural gas burner to a natural gas only burner. Section (a) states that the requirements of this subpart apply to steam generating units for which construction, modification, or reconstruction commenced after June 9, 1989. However, modification is defined in the General Provisions of 40 CFR 60 Subpart A as any physical change in, or change in the method of operation of, an existing facility which increases the amount of any air pollutant (to which a standard applies) emitted into the atmosphere not previously emitted. The modification on the west processing boiler did not increase

emissions, it reduced them. Therefore, the west processing boiler is not subject to 40 CFR 60 Subpart Dc, at the time of this permitting action.

Permit Conditions 4.4 and 4.5 includes the requirements of this subpart.

7.5 NESHAP Applicability (40 CFR 61)

If the facility performs demolition or renovation activities, the facility would be subject to NESHAP 40 CFR 61 Subpart M – National Emission Standard for Asbestos. This facility is not subject to any other NESHAP requirements in 40 CFR 61.

Permit Condition 3.17 includes Subpart M.

7.6 MACT Applicability (40 CFR 63)

The permittee is not subject to 40 CFR 63 Subpart JJJJJJ - National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources because the East and West processing boilers are no longer physically equipped to burn No. 2 fuel oil, as was verified by DEQ on May 8, 2018, and logged in Inspection Report record number 2018AAI1565.

7.7 CAM Applicability (40 CFR 64)

CAM applies to an emission unit with potential pre-control device emissions greater than 100% of the major source threshold for a regulated air pollutant and that uses a control device to achieve compliance with an applicable requirement.

The pollutants which have the potential to exceed the major source threshold are CO, NO_X, and PM_{10}. The emission units which are subject to emissions limitations are listed in the following table.

Table 7.1 EMISSION UNITS AND CONTROL DEVICES SUBJECT TO EMISSION LIMITS

Source Description	Emission Limit	Control Device
Processing East and West boilers, combined emissions from both boilers	PM_{10}, CO, NO_x	None
Scratch-mash air makeup	PM_{10}	None
Reblend room air makeup	PM_{10}	None
Building No. 3 air makeup	PM_{10}	None
Building No. 4 air makeup	PM_{10}	None
Processing peeler exhaust	PM_{10}	None
Flaker Nos. 1 – 5	PM_{10}	None
Dehydration North boiler	PM_{10}	None
Dehydration South boiler	PM_{10}	None
Dehydration air dryer No. 1 A stage	PM_{10}	None
Dehydration air dryer No. 1 B & C stage	PM_{10}	None
Dehydration air dryer No. 2 A stage	PM_{10}	None
Dehydration air dryer No. 2 B & C stage	PM_{10}	None
Dehydration air dryer No. 3 A stage	PM_{10}	None
Dehydration air dryer No. 3 B & C stage	PM_{10}	None
Dehydration bin dryer	PM_{10}	None
Wet area air makeup	PM_{10}	None
South dryer room air makeup	PM_{10}	None
South dryer room roof air makeup	PM_{10}	None
Inspection room roof air makeup	PM_{10}	None
Dehydration research dryer	PM_{10}	None
Dehydration steam peeler	PM_{10}	None

None of the emission units subject to emission limitations or standards utilize control equipment to achieve compliance with the emissions limitations.

Material transfer operations at the facility do utilize baghouses, shown in the Material Transfer Baghouses table.

Table 7.2 MATERIAL TRANSFER BAGHOUSES

Source Description	Emissions Control
Grinding circuit No. 1 material transfer	Grinding circuit No. 1 baghouse, Mikropulsaire, 36 Bag, 2,500 cfm
Grinding circuit No. 2 material transfer	Grinding circuit No. 2 baghouse, Mikropulsaire, 48 bag, 3,360 cfm
Flake material transfer	Flake baghouse, Mikropulsaire, 100 bag, 7,000 cfm
Packaging material transfer	Packaging baghouse No. 1, Mikropulsaire, 9 Bag, 630 cfm
Packaging material transfer	Packaging baghouse No. 2, Mikropulsaire, 25 bag, 1,750 cfm
Crush-room material transfer	Crush-room baghouse No. 1, Mikropulsaire, 9 bag, 630 cfm
Crush-room material transfer	Crush-room baghouse No. 2, Mikropulsaire, 25 bag, 1,750 cfm

However, based upon information provided in the application and guidance published by EPA[1], the material transfer baghouses were determined to be inherent process equipment rather than control devices. Inherent process equipment is not considered a control device for the purposes of CAM applicability in accordance with 40 CFR 64.1.

7.8 Acid Rain Permit (40 CFR 72-75)

The facility is not an affected facility as defined in 40 CFR 72 through 75; therefore, acid rain permit requirements are not applicable.

8. PUBLIC COMMENT

As required by IDAPA 58.01.01.364, a public comment period was made available to the public from February 15, 2019 to March 18, 2019. During this time, comments WERE NOT submitted in response to DEQ's proposed action.

9. EPA REVIEW OF PROPOSED PERMIT

As required by IDAPA 58.01.01.366, DEQ provided the proposed permit to EPA Region 10 for its review and comment on March 19, 2019 via e-mail. On March 19, 2019, EPA Region 10 responded to DEQ via e-mail indicating EPA will not object to the issuance of this permit.

[1] November 27, 1995 letter from David Solomon, Office of Air Quality Planning and Standards EPA, to Timothy Mohin regarding the criteria used in determining whether equipment is air pollution control equipment or process equipment. This was referenced in the SOB for T1-2008.0077, issued October 10, 2008.

Appendix A - Emissions Inventory

Activity	Hourly Emissions, lb/hr							Annual Emissions, ton/yr						
	PM10	PM2.5	NOx	SO_2	CO	Pb	VOC	PM10	PM2.5	NOx	SO_2	CO	Pb	VOC
Process Emissions	16.6	16.6	-	-	-	-	-	72.8	72.8	-	-	-	-	-
Combustion Emissions	1.4	1.4	13.3	0.1	15.1	8.96E-05	1.0	5.3	5.3	49.8	0.4	58.8	3.50E-04	3.9
Total:	*17.98*	*17.98*	*13.32*	*0.11*	*15.05*	*8.96E-05*	*0.99*	*78.13*	*78.13*	*49.85*	*0.42*	*58.81*	*3.50E-04*	*3.85*

Parameter	Value	Units	Basis
HHV, natural gas	1020	Btu/scf	typical value
NG Emission Factors - fuel usage			
NOx - low Nox burners	50	lb/MMscf	AP-42, Table 1.4-1, 1998, Low NOx Burners
NOx	100	lb/MMscf	AP-42, Table 1.4-1, 1998
CO	84	lb/MMscf	AP-42, Table 1.4-1, 1998
PM-10	7.6	lb/MMscf	AP-42, Table 1.4-2, 1998
SO_2	0.6	lb/MMscf	AP-42, Table 1.4-2, 1998
VOC	5.5	lb/MMscf	AP-42, Table 1.4-2, 1998
Lead	0.0005	lb/MMscf	AP-42, Table 1.4-2, 1998
NG Emission Factors - fuel usage			
NOx - low Nox burners	0.0490	lb/MMscf	AP-42, Table 1.4-1, 1998, Low NOx Burners
NOx	0.0490	lb/MMscf	AP-42, Table 1.4-1, 1998
CO	0.0490	lb/MMscf	AP-42, Table 1.4-1, 1998
PM-10	0.0490	lb/MMscf	AP-42, Table 1.4-2, 1998
SO_2	0.0490	lb/MMscf	AP-42, Table 1.4-2, 1998
VOC	0.0490	lb/MMscf	AP-42, Table 1.4-2, 1998
Lead	0.0490	lb/MMscf	AP-42, Table 1.4-2, 1998

CRITERIA EMISSIONS - NATURAL GAS COMBUSTION - Basic American Potato

Current Equipment

Emission Unit	Description	Capacity, MMBtuh	Maximum Annual Duty	Maximum Gas Usage scf/hr	Maximum Gas Usage MMscf/yr	Pounds per Hour PM-10/PM-2.5 Emissions (lb/hr)	Pounds per Hour NOx Emissions (lb/hr)	Pounds per Hour SOx Emissions (lb/hr)	Pounds per Hour CO Emissions (lb/hr)	Pounds per Hour Lead Emissions (lb/hr)	Pounds per Hour VOC Emissions (lb/hr)	Tons per Year PM-10/PM-2.5 Emissions (ton/yr)	Tons per Year NOx Emissions (ton/yr)	Tons per Year SOx Emissions (ton/yr)	Tons per Year CO Emissions (ton/yr)	Tons per Year Lead Emissions (ton/yr)	Tons per Year VOC Emissions (ton/yr)
EU 01	Processing East Boiler	53.4	100%	52,353	458.6	0.3979	2.6176	0.0314	4.3976	2.618E-05	0.2879	1.7427	11.4653	0.1376	19.2617	1.147E-04	1.2612
EU 02	Processing West Boiler	40.5	100%	39,706	347.8	0.3018	1.9853	0.0238	3.3353	1.985E-05	0.2184	1.3217	8.6956	0.1043	14.6086	8.696E-05	0.9565
EU 7	Scratch Match Air Makeup	5	50%	4,902	21.5	0.0373	0.4902	0.0029	0.4118	2.451E-06	0.0270	0.0816	1.0735	0.0064	0.9018	5.368E-06	0.0590
EU 6	Reblend Room Air Makeup	1	50%	980	4.3	0.0075	0.0980	0.0006	0.0824	4.902E-07	0.0054	0.0163	0.2147	0.0013	0.1804	1.074E-06	0.0118
EU 8	Building #3 Air Makeup	3	50%	2,941	12.9	0.0224	0.2941	0.0018	0.2471	1.471E-06	0.0162	0.0490	0.6441	0.0039	0.5411	3.221E-06	0.0354
EU 9	Building #4 Air Makeup	10	50%	9,804	42.9	0.0745	0.9804	0.0059	0.8235	4.902E-06	0.0539	0.1632	2.1471	0.0129	1.8035	1.074E-05	0.1181
EU 20	Dehydration North Boiler	10.5	100%	10,294	90.2	0.0782	1.0294	0.0062	0.8647	5.147E-06	0.0566	0.3427	4.5088	0.0271	3.7874	2.254E-05	0.2480
EU 21	Dehydration South Boiler	8.4	100%	8,235	72.1	0.0626	0.8235	0.0049	0.6918	4.118E-06	0.0453	0.2741	3.6071	0.0216	3.0299	1.804E-05	0.1984
EU 22	Dryer #1 A Stage	6.4	100%	6,275	55.0	0.0477	0.6275	0.0038	0.5271	3.137E-06	0.0345	0.2089	2.7482	0.0165	2.3085	1.374E-05	0.1512
EU 23	Dryer #1 B&C Stages	2.8	100%	2,745	24.0	0.0209	0.2745	0.0016	0.2306	1.373E-06	0.0151	0.0914	1.2024	0.0072	1.0100	6.012E-06	0.0661
EU 24	Dryer #2 A Stage	6.4	100%	6,275	55.0	0.0477	0.6275	0.0038	0.5271	3.137E-06	0.0345	0.2089	2.7482	0.0165	2.3085	1.374E-05	0.1512
EU 25	Dryer #2 B&C Stages	2.8	100%	2,745	24.0	0.0209	0.2745	0.0016	0.2306	1.373E-06	0.0151	0.0914	1.2024	0.0072	1.0100	6.012E-06	0.0661
EU 26	Dryer #3 A Stage	6.4	100%	6,275	55.0	0.0477	0.6275	0.0038	0.5271	3.137E-06	0.0345	0.2089	2.7482	0.0165	2.3085	1.374E-05	0.1512
EU 27	Dryer #3 B&C Stages	2.8	100%	2,745	24.0	0.0209	0.2745	0.0016	0.2306	1.373E-06	0.0151	0.0914	1.2024	0.0072	1.0100	6.012E-06	0.0661
EU 34	Dehy Bin Dryer - New Burner	2	100%	1,961	17.2	0.0149	0.1961	0.0012	0.1647	9.804E-07	0.0108	0.0653	0.8588	0.0052	0.7214	4.294E-06	0.0472
EU 35	Wet Area Air Makeup	3.5	50%	3,431	15.0	0.0261	0.3431	0.0021	0.2882	1.716E-06	0.0189	0.0571	0.7515	0.0045	0.6312	3.757E-06	0.0413
EU 36	South Dryer Room 4&5 Air Makeup	5	50%	4,902	21.5	0.0373	0.4902	0.0029	0.4118	2.451E-06	0.0270	0.0816	1.0735	0.0064	0.9018	5.368E-06	0.0590
EU 37	South Dryer Room 4&5 Roof Air Makeup	5	50%	4,902	21.5	0.0373	0.4902	0.0029	0.4118	2.451E-06	0.0270	0.0816	1.0735	0.0064	0.9018	5.368E-06	0.0590
EU 38	Inspection Room Roof Air Makeup	3.5	50%	3,431	15.0	0.0261	0.3431	0.0021	0.2882	1.716E-06	0.0189	0.0571	0.7515	0.0045	0.6312	3.757E-06	0.0413
EU 39	Dehydration Research Dryer	0.88	100%	863	7.6	0.0066	0.0863	0.0005	0.0725	4.314E-07	0.0047	0.0287	0.3779	0.0023	0.3174	1.889E-06	0.0208
EU 68	New Air Makeup Unit	3.5	50%	3,431	15.0	0.03	0.34	0.0021	0.2882	1.72E-06	0.0189	0.06	0.75	0.00	0.63	3.757E-06	0.04
	Total:	182.78		179,196	1,400.1	1.36	13.32	0.1075	15.0525	8.96E-05	0.9856	5.32	49.85	0.42	58.81	3.500E-04	3.85

Notes:

* Potential to Emit for Air Makeup Unit is 50% of capacity for annual usage.

PARTICULATE PROCESS EMISSIONS - DRYERS, FLAKERS, PEELERS AND BAGHOUSE EQUIPMENT - NONPAREIL

Description	Throughput		PM Emission Factor			PM		PM10		PM2.5	
	Value	Units	Value	Units	Reference	lb/hr	ton/yr[a]	lb/hr	ton/yr[a]	lb/hr	ton/yr[a]
Current Equipment											
Processing Peeler Exhaust	5,000	lb/hr	0.064	lb/ton	Mass Balance - Tier II OP 011-00027, Tech Memo	0.16	0.70	0.16	0.70	0.16	0.70
Flaker Nos. 1	1,250	lb/hr	4	lb/ton	Based on review of five flaker emissions tests	2.50	10.95	2.50	10.95	2.50	10.95
Flaker Nos. 2	1,250	lb/hr	4	lb/ton	Same as Flaker #1	2.50	10.95	2.50	10.95	2.50	10.95
Flaker Nos. 3	1,000	lb/hr	4	lb/ton	Same as Flaker #1	2.00	8.76	2.00	8.76	2.00	8.76
Flaker Nos. 4	1,000	lb/hr	4	lb/ton	Same as Flaker #1	2.00	8.76	2.00	8.76	2.00	8.76
Flaker Nos. 5	1,000	lb/hr	4	lb/ton	Same as Flaker #1	2.00	8.76	2.00	8.76	2.00	8.76
Dehydration Air Dryer #1 A Stage	1,000	lb/hr	2.08	lb/ton	Based on review of four stack tests from similar dryers	1.04	4.56	1.04	4.56	1.04	4.56
Dehydration Air Dryer #1 B&C Stages	1,000	lb/hr	0.92	lb/ton	Based on review of four stack tests from similar dryers	0.46	2.01	0.46	2.01	0.46	2.01
Dehydration Air Dryer #2 A Stage	1,000	lb/hr	2.08	lb/ton	Same as Dehydration Air Dryer #1 A Stage	1.04	4.56	1.04	4.56	1.04	4.56
Dehydration Air Dryer #2 B&C Stages	1,000	lb/hr	0.92	lb/ton	Same as Dehydration Air Dryer #1 B&C Stages	0.46	2.01	0.46	2.01	0.46	2.01
Dehydration Air Dryer #3 A Stage	1,000	lb/hr	2.08	lb/ton	Same as Dehydration Air Dryer #1 A Stage	1.04	4.56	1.04	4.56	1.04	4.56
Dehydration Air Dryer #3 B&C Stages	1,000	lb/hr	0.92	lb/ton	Same as Dehydration Air Dryer #1 B&C Stages	0.46	2.01	0.46	2.01	0.46	2.01
Dehydration Bin Dryer[d]	1,000	lb/hr	1.25	lb/ton	2004 Source Test. PM-10 emissions assume 44% of PM is PM-10 (AP-42, Appendix B.1-9.9.2)	0.63	2.74	0.63	2.74	0.63	2.74
Dehydration Research Dryer	125	lb/hr	2.8	lb/ton	Mass Balance - Tier II OP 011-00027, Tech Memo	0.18	0.77	0.18	0.77	0.18	0.77
Dehydration Steam Peeler	5,000	lb/hr	0.064	lb/ton	Mass Balance - Tier II OP 011-00027, Tech Memo	0.16	0.70	0.16	0.70	0.16	0.70
Description	**Throughput (ACF/hr)**		**Emission Factor (lb PM / ACF)[c]**		**EF Reference**	**PM Emissions (lb/hr)[b]**	**PM Emissions (T/yr) [a]**	**PM-10 Emissions (lb/hr)**	**PM-10 Emissions (T/yr) [a]**	**PM-2.5 Emissions (lb/hr)**	**PM-2.5 Emissions (T/yr) [a]**
Grinding Circuit No. 1 Baghouse	150,000		2.87E-09		Manufacturer's Guarantee - See Environmental Quality Evaluation Report	0.00043	0.00188	0.00	0.00	0.00	0.00
Grinding Circuit No. 2 Baghouse	201,600		2.87E-09		Manufacturer's Guarantee - See Environmental Quality Evaluation Report	0.00058	0.00253	0.00058	0.00253	0.00058	0.00253
Flake Baghouse	420,000		2.87E-09		Manufacturer's Guarantee - See Environmental Quality Evaluation Report	0.00120	0.00527	0.00120	0.00527	0.00120	0.00527
Packing Baghouse No. 1	37,800		2.87E-09		Manufacturer's Guarantee - See Environmental Quality Evaluation Report	0.00011	0.00047	0.00011	0.00047	0.00011	0.00047
Packing Baghouse No. 2	105,000		2.87E-09		Manufacturer's Guarantee - See Environmental Quality Evaluation Report	0.00030	0.00132	0.00030	0.00132	0.00030	0.00132
Crush-room Baghouse No. 1	37,800		2.87E-09		Manufacturer's Guarantee - See Environmental Quality Evaluation Report	0.00011	0.00047	0.00011	0.00047	0.00011	0.00047
Crush-room Baghouse No. 2	105,000		2.87E-09		Manufacturer's Guarantee - See Environmental Quality Evaluation Report	0.00030	0.00132	0.00030	0.00132	0.00030	0.00132
Total Equipment Emissions						**16.62**	**72.81**	**16.62**	**72.81**	**16.62**	**72.81**

[a] Based on 8,760 hours per year

[d] The Dehydration Bin Dryer process closely resembles the Dehydration Air Dryers Stage C

c EF = (0.000017 gr/dscf / 7000 gr/lb) * 1.18 dscf/acf = 2.87E-09 acf = dscf * (70 + 460)/528 * (29.92/25.422)

Toxic and Hazardous Air Pollutant Emission Factors - NG Burners

Maximum NG Combustion, MMscf	Hourly	Annual
	0.179	1400.1

Air Pollutant	Emission Factor lb/MMscf	Emission Factor Reference	EPA Hazardous Air Pollutant?	Idaho Toxic Air Pollutant?	Potential Emissions lb/hr	Potential Emissions lb/yr
POM Components						
Acenaphthene	1.80E-06*	AP-42, Table 1.4-3	Yes	Yes (General PAH)	3.23E-07	2.52E-03
Acenaphthylene	1.80E-06*	AP-42, Table 1.4-3	Yes	Yes (General PAH)	3.23E-07	2.52E-03
Anthracene	2.40E-06*	AP-42, Table 1.4-3	Yes	Yes (General PAH)	4.30E-07	3.36E-03
Benz(a)anthracene	1.80E-06*	AP-42, Table 1.4-3	Yes	Yes (7-PAH Group)	3.23E-07	2.52E-03
Benzo(a)pyrene	1.20E-06*	AP-42, Table 1.4-3	Yes	Yes (7-PAH Group)	2.15E-07	1.68E-03
Benzo(b)fluoranthene	1.80E-06*	AP-42, Table 1.4-3	Yes	Yes (7-PAH Group)	3.23E-07	2.52E-03
Benzo(g,h,i)perylene	1.20E-06*	AP-42, Table 1.4-3	Yes	Yes (General PAH)	2.15E-07	1.68E-03
Benzo(k)fluoroanthene	1.80E-06*	AP-42, Table 1.4-3	Yes	Yes (7-PAH Group)	3.23E-07	2.52E-03
Chrysene	1.80E-06*	AP-42, Table 1.4-3	Yes	Yes (7-PAH Group)	3.23E-07	2.52E-03
Dibenzo(a,h)anthracene	1.20E-06*	AP-42, Table 1.4-3	Yes	Yes (7-PAH Group)	2.15E-07	1.68E-03
7,12-Dimethylbenz(a)anthracene	1.60E-05*	AP-42, Table 1.4-3	Yes	Yes (General PAH)	2.87E-06	2.24E-02
Fluoranthene	3.00E-06	AP-42, Table 1.4-3	Yes	Yes (General PAH)	5.38E-07	4.20E-03
Fluorene	2.80E-06	AP-42, Table 1.4-3	Yes	Yes (General PAH)	5.02E-07	3.92E-03
Indeno(1,2,3-cd)pyrene	1.80E-06*	AP-42, Table 1.4-3	Yes	Yes (7-PAH Group)	3.23E-07	2.52E-03
2-Methylnaphthalene	2.40E-05	AP-42, Table 1.4-3	Yes	Yes (General PAH)	4.30E-06	3.36E-02
3-Methylchloroanthene	1.80E-06*	AP-42, Table 1.4-3	Yes	Yes (General PAH)	3.23E-07	2.52E-03
Naphthalene	6.10E-04	AP-42, Table 1.4-3	Yes	Yes (General PAH)	1.09E-04	8.54E-01
Phenanthrene	1.70E-05	AP-42, Table 1.4-3	Yes	Yes (General PAH)	3.05E-06	2.38E-02
Pyrene	5.00E-06	AP-42, Table 1.4-3	Yes	Yes (General PAH)	8.96E-07	7.00E-03
PAH (Idaho)	*6.87E-04*	*Summation of individual ID PAH components*	-	*Yes (Carcinogen)*	*1.23E-04*	*9.62E-01*
POM (Idaho)	*1.14E-05*	*Summation of ID POM 7-PAH components*	-	*Yes (Carcinogen)*	*2.04E-06*	*1.60E-02*
POM (EPA)	*6.98E-04*	*Sum of individual POM componnents*	*Yes*	-	*1.25E-04*	*9.78E-01*
Benzene	2.10E-03	AP-42, Table 1.4-3	Yes	Yes (Carcinogen)	3.76E-04	2.94E+00
Dichlorobenzene	1.20E-03	AP-42, Table 1.4-3	Yes	Yes (Noncarcinogen)	2.15E-04	1.68E+00
Formaldehyde	7.50E-02	AP-42, Table 1.4-3	Yes	Yes (Carcinogen)	1.34E-02	1.05E+02
Hexane	1.80E+00	AP-42, Table 1.4-3	Yes	Yes (Noncarcinogen)	3.23E-01	2.52E+03
Pentane	2.60E+00	AP-42, Table 1.4-3	No	Yes (Noncarcinogen)	4.66E-01	3.64E+03
Toluene	3.40E-03	AP-42, Table 1.4-3	Yes	Yes (Noncarcinogen)	6.09E-04	4.76E+00
Arsenic	2.00E-04	AP-42, Table 1.4-4	Yes	Yes (Carcinogen)	3.58E-05	2.80E-01
Beryllium	1.20E-05*	AP-42, Table 1.4-4	Yes	Yes (Carcinogen)	2.16E-06	1.69E-02
Cadmium	1.10E-03	AP-42, Table 1.4-4	Yes	Yes (Carcinogen)	1.97E-04	1.54E+00
Chromium	1.40E-03	AP-42, Table 1.4-4	Yes	Yes (Noncarcinogen)	2.50E-04	1.96E+00
Chromium (VI)	6.99E-05	5% of chromium assumed to be Chromium (VI)‡	No	Yes (Carcinogen)	1.25E-05	9.78E-02
Cobalt	8.40E-05	AP-42, Table 1.4-4	Yes	Yes (Noncarcinogen)	1.51E-05	1.18E-01
Lead	5.00E-04	AP-42, Table 1.4-2	Yes	Yes (Noncarcinogen)	8.96E-05	7.00E-01
Manganese	3.80E-04	AP-42, Table 1.4-4	Yes	Yes (Noncarcinogen)	6.82E-05	5.33E-01
Mercury	2.60E-04	AP-42, Table 1.4-4	Yes	Yes (Noncarcinogen)	4.66E-05	3.64E-01
Nickel	2.10E-03	AP-42, Table 1.4-4	Yes	Yes (Carcinogen)	3.77E-04	2.94E+00
Selenium	2.40E-05*	AP-42, Table 1.4-4	Yes	Yes (Noncarcinogen)	4.30E-06	3.36E-02
Nitrous Oxide	2.20E+00	AP-42, Table 1.4-2	No	Yes (Noncarcinogen)	3.94E-01	3.08E+03
HAP Analysis						
EPA Total HAPs	*1.89E+00*	*Summation of individual EPA HAP components*				*2644*
Largest Individual HAP						
Hexane	1.80E+00					2520

* Emission factor is Method Detection Limit

† Based on 1020 BTU/scf natural gas heat content

‡ See "AB 2588 Combustion Emission Factors", Ventura County APCD, May 17, 2001.

Appendix B - Facility Comments for Draft Permit

BAF Comments Regarding Permit T1-2018.0013 (Project 62002)

Reference	Existing Language	Proposed Change	Justification
Table 3.1 Header Table 4.2 Header Table 5.2 Header Table 6.2 Header	Additional language	"The table is for reference only. Specific requirements are set forth in individual permit sections below"	Clarification that the enforceable requirements are the ones in specific portions of the permit, not in the table. Eliminates ambiguity if there is a conflict between the table and a specific permit provision,
Emission Limits 5.1	The PM10 emissions from any stack or dryer listed in Table 7.1 shall not exceed the corresponding emissions rate limits listed in the table.	Language that indicates meeting through-put limits shows compliance with emission limits.	Is there a reason to have both emission limits and production limits? A throughput limit should demonstrate compliance with an emission limits.
5.3 and 6.3 Throughput Limits	Additional language	Add a statement that compliance with the throughput limits demonstrates compliance with the PM limits.	Clarification
Table 7.1	Table 7.1 describes the devices used to control emissions from PM10 Emission Sources.	"Table 7.1 lists PM10 emission limits for facility emission sources."	Correction
Please note change in facility manager/certifying official.	Brent Struhs	Chris Cappo	Change

Response to Facility Draft Comments

Comment 1: Additional laguage added.

Comment 2: The emission limit and production limit are in the underlying PTC, which must be changed first to modify content of the Title V permit. Please note, footnote a) of Table 7.1 already addresses this by indicating "In absence of any other credible evidence, compliance with the Emission Limits is assured by complying with permit operating, monitoring, and record keeping requirements."

Comment 3: See response to Comment 2.

Comment 4: The correction was made.

Comment 5: The DEQ IEDM facility contacts list has been updated.