

# **Statement of Basis**

**Permit to Construct No. P-2012.0036  
Project ID 61073**

**J. R. Simplot Company - Food Group  
Nampa, Idaho**

**Facility ID 027-00059**

**Final**

**February 4, 2013  
Robert Baldwin  
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

Btu	British thermal units
CAA	Clean Air Act
cfm	cubic feet per minute
CFR	Code of Federal Regulations
CO	carbon monoxide
CO <sub>2</sub>	carbon dioxide
CO <sub>2</sub> e	CO <sub>2</sub> equivalent emissions
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EL	screening emission levels
EPA	U.S. Environmental Protection Agency
GHG	greenhouse gases
HAP	hazardous air pollutants
hr/yr	hours per consecutive 12 calendar month period
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 <sub>2</sub>	nitrogen dioxide
NO <sub>x</sub>	nitrogen oxides
NSPS	New Source Performance Standards
O&M	operation and maintenance
O <sub>2</sub>	oxygen
PC	permit condition
PM	particulate matter
PM <sub>2.5</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers
PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTC/T2	permit to construct and Tier II operating permit
PTE	potential to emit
<i>Rules</i>	<i>Rules for the Control of Air Pollution in Idaho</i>
scf	standard cubic feet
SM	synthetic minor
SM80	synthetic minor facility with emissions greater than or equal to 80% of a major source threshold
SO <sub>2</sub>	sulfur dioxide
SO <sub>x</sub>	sulfur oxides
T/yr	tons per consecutive 12 calendar month period
TAP	toxic air pollutants
VOC	volatile organic compounds
µg/m <sup>3</sup>	micrograms per cubic meter

## FACILITY INFORMATION

### *Description*

J.R. Simplot Company's Nampa facility is a potato processing plant which processes raw potatoes into french fries and other frozen potato products. Potatoes are washed, peeled and sorted by size into two processing lines. Smaller potatoes are processed on the Specialty Line and larger potatoes are processed on the Main Line. Resulting potato products are frozen and packed for shipping. The steam used in the process lines are provided by two boilers, the Nebraska boiler and the Cleaver Brooks boiler. The Nebraska boiler is the primary boiler. Steam is used to provide heat to loosen the potato skins for peeling, to dry the potato pieces before frying, and to create hot oil for frying. The sources for emissions to the atmosphere are the boiler's exhaust, dryer's exhaust, air make up unit's exhaust, and fryer's exhaust. The Main Line Fryer's and the Specialty Line Fryer's exhaust are controlled by a wet electrostatic precipitator. (WESP).

### *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).

January 3, 1996	T2-027-00059, A Tier II operating permit for the boilers, fryers, dryers, and air makeup units.(S)s
December 19, 2000	PTC-027-00059, PTC for the installation of the Nebraska model MS-E-66 natural gas boiler(S)
September 4, 2002	T2/PTC T2-010032, renew and change the permittee name for T2 permit No. 027-00059 issued January 3, 1996, incorporate an existing PTC issued December 19, 2000 and issue a new PTC for the anaerobic digester.(S)
January 21, 2004	T2/PTC T2-030064, replaced Tier II No. 027-00059 issued January 3, 1996, and incorporated PTC No. 207-00059 issued December 15, 2000 and Tier II operating permit and PTC No. T2-010032 issued September 4, 2002. (S)
November 20, 2007	T2/PTC No. T2-2007.0168, this Tier II operating permit and PTC renewal replaces T2-030064 issued on January 21, 2004(A) , but will become S upon issuance of this permit
February 1, 2013	P-2012.0066 project 61073, replace the T2-PTC No. T2-2007.0168 issued on November 20 2007 with a facility-wide PTC. (A)

### *Application Scope*

This is a revised permit to construct (PTC) for the replacement of the existing PTC/T2 Permit No. 2007.0168 issued on November 20, 2007 and to establish a GHG emissions limit.

The applicant has proposed to:

- Limit the Greenhouse Gases to 99, 000 tons per year

### *Application Chronology*

June 5, 2012	DEQ received an application
June 19, 2012	DEQ received an application fee.
June 25 to July 10, 2012	DEQ provided an opportunity to request a public comment period on the application and proposed permitting action.
July 29, 2012	DEQ determined that the application was complete.

September 19, 2012 DEQ made available the draft permit and statement of basis for peer and regional office review.

September 19, 2012 DEQ made available the draft permit and statement of basis for applicant review.

October 1, 2012 DEQ received a response from the facility regarding the draft permit.

## TECHNICAL ANALYSIS

### Emissions Units and Control Equipment

**Table 1 EMISSIONS UNIT AND CONTROL EQUIPMENT INFORMATION**

Sources	Control Equipment	Emission Point ID No.
<u>Natural Gas Combustion Equipment</u> Name: Nebraska Boiler Manufacturer: Nebraska Model: MS-E-66 Fuel: Natural Gas Maximum Rated Capacity: 99.8 MMBtu/hr; 75,000 lbs of steam/hr  Name: Cleaver Brooks Boiler Manufacturer: Cleaver Brooks Model: DL 68 WL 1097 Fuel: Natural Gas Maximum Rated Capacity: 70 MMBtu/hr, 50,000 lbs of steam/hr  Name: Air Makeup Units (AMUs) (9 total) Manufacturers: Aerovent Gas (2), Aerovent (1), Aladdin (1), Reyco Systems (1), King (3), Unknown (1) Models: G3-32B4 Type DW, G60 V 604 (Aerovent Gas AMUs), BA 490 DWD1 (Aladdin), others unknown Fuel: Natural Gas Maximum Rated Capacity: All less than 10 MMBtu/hr	<u>Control Device Name:</u> None  None  None	Exit height: 15.9 m Exit diameter: 1.1 m Exit flow rate: 16.5 m/sec Exit temperature: 160 °C  Exit height: 15.5 m Exit diameter: 1.9 m Exit flow rate: 10.1 m/sec Exit temperature: 177 °C  Exit height: 15.2 m Exit diameter: 1.1 m Exit flow rate: 5.5 m/sec Exit temperature: 39 °C
<u>Process Equipment</u> Name: Main Line Dryer Manufacturer: National Drying Model: 1987 CARN Fuel: Natural Gas Maximum Production Rate: 38,000 lb/hr; 21 MMBtu/hr  Name: Main Line Fryer Manufacturer: Heat and Control Model: FF6028-5-3F Fuel: Steam Maximum Production Rate: 38,000 lbs/hr  Name: Specialty Line Dryer/Cooler Manufacturer: Proctor Schwartz Model: K21761 Fuel: None Maximum Production Rate: 3,500 lbs/hr Name: Specialty Line Dryer Manufacturer: Proctor Schwartz Model: K21761 Fuel: Natural Gas Maximum Production Rate: 3,500 lbs/hr; 2 MMBtu/hr	None  Name: Wet Electrostatic Precipitator Manufacturer: Geoenergy Model: E-tube Date installed: 2007 Pre-Control device: Cyclone  None  None	Exit height: 19.4 m Exit diameter: 2.0 m Exit flow rate: 6.9 m/sec Exit temperature: 66 °C  Exit height: 12.8 m Exit diameter: 0.7 m Exit flow rate: 8.0 m/sec Exit temperature: 63 °C  Exit height: 12.5 m Exit diameter: 0.7 m Exit flow rate: 9.2 m/sec Exit temperature: 27 °C

Name: Specialty Line Fryer Manufacturer: Gem Equipment Model: 1700 Fuel: Steam Maximum Production Rate: 3,500 lbs/hr	Name: Wet Electrostatic Precipitator Manufacturer: Geoenergy Model: E-tube Date installed: 2007 Pre-Control device: Cyclone	Exit height: 19.4 m Exit diameter: 2.0 m Exit flow rate: 6.9 m/sec Exit temperature: 66 °C
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## 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 entire facility based on the maximum natural gas usage of the operations at the facility with this proposed project. Emissions estimates of criteria pollutant, GHG, HAP PTE were based on emission factors from AP-42, maximum operations of each emission unit, and process information specific to the facility for this proposed project.

### 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. For this operation uncontrolled Potential to Emit is based upon a worst-case for operation of the facility of 8760 hr/yr.

**Table 2 UNCONTROLLED POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS**

Source	PM <sub>10</sub> /PM <sub>2.5</sub> T/yr	SO <sub>2</sub> T/yr	NO <sub>x</sub> T/yr	CO T/yr	VOC T/yr	CO <sub>2</sub> e T/yr
<b>Point Sources</b>						
Nebraska boiler	3.2	0.3	21.1	35.5	2.3	51144.5
Cleaver Brooks boiler	2.3	0.18	29.7	24.9	1.6	35873.3
Main Line dryer	3.2	0.1	8.9	7.5	37.1	10761
Main Line fryer	40.9	0.00	0.00	0.00	7.6	
Specialty Line dryer	1.8	0.01	0.4	0.7	1.1	1025
Specialty Line fryer	31.9	0	0	0	13.8	
Specialty Line cooler	1.8	0	0	0	1.1	
AMUs	1.2	0.1	15.5	13.1	0.9	18807
<b>Total, Point Sources</b>	<b>86.30</b>	<b>0.69</b>	<b>75.60</b>	<b>81.70</b>	<b>65.50</b>	<b>117610.80</b>

### **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.

This project consists of setting a throughput limit of the natural gas to be combusted in a consecutive 12-month period. This limitation restricts the facility wide criteria emissions and the GHG emissions. The limitation is a reduction of the previous emissions limit of the criteria pollutant emissions. The natural gas limitation reduces the GHG emission to less than the major threshold. The GHG emission rate of 99,000 tons per consecutive 12-month period provides the facility with the classification of SM-80. Since this is a facility wide emission rate for both the criteria pollutants and GHG and not emissions from each emission unit, no table is needed.

### **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. The change in Potential to Emit for the facility is a reduction in the criteria pollutant emissions and a recognized limit of GHG emission of 99, 000 tons per year.

**Table 3 CHANGES IN POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS**

Source	PM <sub>10</sub> /PM <sub>2.5</sub> T/yr	SO <sub>2</sub> T/yr	NO <sub>x</sub> T/yr	CO T/yr	VOC T/yr	CO <sub>2e</sub> T/yr
Pre-Project Potential to Emit	88.61	0.58	75.65	81.66	65.50	117611
Post Project Potential to Emit	74.43	0.49	63.68	68.59	55.02	99,000
<b>Changes in Potential to Emit</b>	<b>-14.18</b>	<b>-0.09</b>	<b>-11.97</b>	<b>-13.07</b>	<b>-10.48</b>	<b>-18611.0</b>

### **Post Project HAP Emissions**

The reduction in natural gas usage decreased the HAP emissions. Thus no HAP emission table is required for this project but the HAP emission analysis is available in the previous permitting action (T2/PTC No. T2-2007.0168 issued November 27, 2007).

### **Ambient Air Quality Impact Analyses**

No Modeling was required for this permitting action.

Modeling was performed on the previous permitting action and can be found in the Statement of Basis for the T2/PTC No. T2-2007.0168 issued November 27, 2007.

## **REGULATORY ANALYSIS**

### **Attainment Designation (40 CFR 81.313)**

The facility is located in Canyon County, which is designated as attainment or unclassifiable for PM<sub>2.5</sub>, PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>2</sub>, CO, and Ozone. Refer to 40 CFR 81.313 for additional information.

### **Facility Classification**

“Synthetic Minor” classification for criteria pollutants is defined as the uncontrolled Potential to Emit for criteria pollutants are above the applicable major source thresholds and the Potential to Emit for criteria pollutants fall below the applicable major source thresholds. Therefore, the following table compares the uncontrolled Potential to Emit and the Potential to Emit for criteria pollutants to the Major Source thresholds to determine if the facility will be “Synthetic Minor.”

**Table 3 UNCONTROLLED PTE AND PTE FOR REGULATED AIR POLLUTANTS COMPARED TO THE MAJOR SOURCE THRESHOLDS**

Pollutant	Uncontrolled PTE (T/yr)	PTE (T/yr)	Major Source Thresholds (T/yr)	Uncontrolled PTE Exceeds the Major Source Threshold and PTE Exceeds the Major Source Threshold?
PM <sub>10</sub> /M <sub>2.5</sub>	88.6	74.53	100	No
SO <sub>2</sub>	0.58	0.49	100	No
NO <sub>x</sub>	75.6	63.68	100	No
CO	81.7	68.59	100	No
VOC	65.5	55.02	100	No
CO <sub>2e</sub>	117,612	99,000	100,000	Yes/No

“Synthetic Minor” classification for HAP pollutants is defined as the uncontrolled Potential to Emit for HAP pollutants are above the applicable major source thresholds and the Potential to Emit for HAP pollutants fall below the applicable major source thresholds. Therefore, the following table compares the uncontrolled Potential to Emit and the Potential to Emit for HAP pollutants to the Major Source thresholds to determine if the facility will be “Synthetic Minor.”

The prior permitting action has determined the uncontrolled Potential to Emit and the Potential to Emit for HAP pollutants do not equal or exceed any threshold for individual HAP or the combined total of HAPs.

As demonstrated in Table 4, the facility’s uncontrolled potential to emit for PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>2</sub>, NO<sub>x</sub>, CO, and VOC emissions are less than the Major Source thresholds of 100 T/yr for each pollutant. In addition, the facility has uncontrolled potential HAP emissions of less than the Major Source threshold of 10 T/yr and for all HAP combined less than the Major Source threshold of 25 T/yr.

The GHG emission based of uncontrolled Potential to Emit does exceed the 100,000 ton per year threshold but is permitted to below the threshold with the restrictions of the throughput of natural gas that can be combusted in a consecutive 12- month period. However, this restriction has the GHG emissions within 80 percent of the threshold classifying the facility as a SM-80 facility.

**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 converting the existing Tier II operating permit and PTC to a facility-wide PTC with an emissions limit for Greenhouse Gases below the major source threshold. 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.

**Fugitive Emissions (IDAPA 58.01.01.650-651)**

IDAPA 58.01.01.650-651 .....Fugitives Emissions

All reasonable precautions shall be taken to prevent PM from becoming airborne. These requirements are assured by Permit Conditions 2.1 through 2.4.

**Visible Emissions (IDAPA 58.01.01.625)**

IDAPA 58.01.01.625 .....Visible Emissions

The sources of PM<sub>10</sub> emissions at this facility are subject to the State of Idaho visible emissions standard of 20% opacity. This requirement is assured by Permit Conditions 2.7 and 2.8.

**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 PM10, SO2, NOx, CO, VOC, and HAP or 10 tons per year for any HAP or 25 tons per year for all HAPs combined as demonstrated previously. 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)**

The facility is subject to the requirements of 40 CFR 60 Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units, and 40 CFR 60 Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines.

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

All boilers at this facility only combust natural gas as fuel as required Permit Condition 3.6. Therefore, the only Sections of this subpart that are applicable to the Nebraska boiler at this facility are the Applicability and Delegation of Authority specified in § CFR 60.40c(a), the Recordkeeping requirements of § CFR 60.48c(g) and (i), and the Reporting requirements of § CFR 60.48c(a), (a)(1), and (a)(3).

§ 60.40c.....Applicability and Delegation of Authority

Section (a) specifies that except as provided in paragraph (d) 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/hr)) or less, but greater than or equal to 2.9 MW (10 MMBtu/hr).

The Nebraska natural gas-fired boiler is rated at between 10 MMBtu/hr and 100 MMBtu/hr and was constructed after June 9, 1989. Therefore, the Nebraska natural gas fired boiler is subject to some of the requirements of this subpart.

§ 60.41c.....Definitions

The definitions of this section apply to the Nebraska natural gas-fired boiler at this facility.

§ 60.48c.....Reporting and recordkeeping requirements

Section (a) requires that 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:

- The design heat capacity of the affected facility and identification of fuels to be combusted in the affected facility
- If applicable, a copy of the Federally enforceable requirement that limit the annual capacity factor for any fuel or mixture of fuels under section 60.42.c, or 60.43c
- The annual capacity factor at which the owner or operator anticipates operating the affected facility base on all fuels fired and based on each individual fuel fired

The Nebraska boiler was installed in 1989 and the notifications have been fulfilled.

**NESHAP Applicability (40 CFR 61)**

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

**MACT Applicability (40 CFR 63)**

The facility is subject to any MACT standards in 40 CFR Part 63. The facility has two emergency engines that are subject to subpart ZZZZ. These engines are subject to the requirements of Table 2d (5) of subpart ZZZZ. The emissions are below 100 horsepower and have spark ignitions. The two engines are subject to the work practices described in section 5 of Table 2d of 40 CFR 63 Subpart ZZZZ. The work practices include the permittee to change the oil and filter every 500 hours of operation or annually whichever comes first, inspect the spark plugs every 1000 hours of operation or annually whichever comes first, and inspect all hoses and belts every 500 hours or operation or annually whichever comes first, and replace as necessary.

Subpart ZZZZ of Part 63—Applicability of General Provisions to Subpart ZZZZ.

As stated in § 63.6665, the permittee must comply with the following applicable general provisions.

General provisions citation	Subject of citation	Applies to subpart	Explanation
§ 63.1	General applicability of the General Provisions	Yes.	
§ 63.2	Definitions	Yes	Additional terms defined in § 63.6675.
§ 63.3	Units and abbreviations	Yes.	
§ 63.4	Prohibited activities and circumvention	Yes.	
§ 63.6(a)	Applicability	Yes.	
§ 63.6(b)(5)	Notification	Yes.	
§ 63.6(b)(6)	[Reserved]		
§ 63.6(c)(1)-(2)	Compliance dates for existing sources	Yes.	
§ 63.6(d)	[Reserved]		
§ 63.10(b)(1)	Record retention	Yes.	
§ 63.12	State authority and delegations	Yes.	
§ 63.13	Addresses	Yes.	
§ 63.14	Incorporation by reference	Yes.	
§ 63.15	Availability of information	Yes.	

[75 FR 9688, Mar. 3, 2010]

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**Permit Conditions Review**

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

## Existing Permit Condition 2.11

### Obligation to Comply

This permit condition was removed for the Facility-wide Conditions because a similar permit conditions is stated in the General Provisions as permit condition 5.1.

Existing Permit Condition 2.12 was renumbered to 2.11

Existing Permit Condition 2.13 was renumbered to 2.12

Existing Permit Condition 2.14 was renumbered to 2.13

Existing Permit Condition 2.15 was renumbered to 2.14

## New Permit Condition 3.4

### GHG emission Limit

The permittee requested a new permit condition that would limit the facilities GHG emissions to below the 100,000 ton per year major source threshold limit. This permit condition limits the GHG emissions to 99,000 tons per year.

## New Permit Condition 3.5

To assure compliance with PC 3.4 the facility was issued a limit on the facility wide natural gas to be combusted in any consecutive 12-month period.

Existing Permit Condition 3.4 was renumbered to 3.6

New permit condition 3.7, the facility shall monitor and record the total amount of natural gas combusted at the facility in a consecutive 12-month period basis to determine compliance with permit conditions 3.4 and 3.5.

Existing Permit Condition 3.5 was renumbered to 3.8.

## New Permit Condition 5.3

The permittee shall operate the emergency engines in compliance with the operational requirements of 40 CFR 63 subpart ZZZZ as they apply. The permittee stated in correspondence of October 1, 2012, the facility has on site two emergency engines (24 Hp and 94 Hp). The permittee stated the emergency engines are subject to 40 CFR 63 subpart ZZZZ thus the engines became subject to the operational requirements. These operational requirements are generally work practice requirements. The permittee shall demonstrate compliance with this permit condition by performing these work practice requirements and maintaining records of the operational performances. The permittee must comply with these operational requirements no later than October 19, 2013.

## New Permit Condition 5.4

The permittee has two engines that are subject to subpart ZZZZ and must meet the notification requirements of 40 CFR 63 subpart A.

## New Permit Condition 5.5

The permittee shall operate the emergency engines in compliance with the operational requirements of 40 CFR 63 subpart ZZZZ as they apply. Subpart ZZZZ has requirements for monitoring and recording the operational and maintenance of the work practice requirements. The permittee must comply with the work practice requirements listed in Table 2d of this subpart. The permittee shall demonstrate compliance by maintaining the records as they apply and stated within 40 CFR 63 subpart ZZZZ.

These work requirements include change of oil and filter every 500 hours of operation or annually whichever comes first; inspection of spark plugs every 1000 hours of operation or annually whichever comes first; and inspection of all hoses and belts every 500 hours of operation or annually whichever comes first, and replace necessary.

#### New Permit Condition 5.6

This permit condition (e) states the permittee must operate and maintain the RICE in a manner consistent with good air pollution control practice for minimizing emissions.

This permit condition (f) states the permittee must install a non-resettable hour work meter to assist in demonstrating compliance with the permit conditions of subpart ZZZZ.

This permit condition (h) states the permittee must minimize the engine's idle and startup times to not exceed 30 minutes, after which the emission standards applicable to this subpart apply.

This permit condition (i) provides the permittee with an option regarding the oil changes. This option is to have an oil analysis following the procedures within 40 CFR 63.6625.2

#### New Permit Condition 5.7

This permit conditions states the permittee must at all times be in compliance with the emission limitations and operating limitations of subpart ZZZZ.

#### New Permit Condition 5.8

This permit condition states the permittee must demonstrate compliance with the operating conditions stated in Table 2d of subpart ZZZZ.

#### New Permit Condition 5.9

This permit condition states the permittee must keep records to the maintenance to determine compliance with the stated maintenance plan for an stationary RICE located at an area source of HAP emissions.

#### New Permit Condition 5.10

This permit Condition stated the permittee must keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record according to 40 CFR 63.10(b)(1) to demonstrate compliance with the permit conditions.

#### New Permit Condition 5.11

This permit condition states the permittee must maintain the records of the maintenance performed in compliance with permit condition 5.5 for 5 years and the various formats the records shall be kept to demonstrate compliance with Permit Condition 5.7.

The New General Provisions provided with this permitting action are the current standard General Provisions for a PTC permitting action.

#### Permit Condition 6.1

The duty to comply general compliance provision requires that the permittee comply with all of the permit terms and conditions pursuant to Idaho Code §39-101.

#### Permit Condition 6.2

The maintenance and operation general compliance provision requires that the permittee maintain and operate all treatment and control facilities at the facility in accordance with IDAPA 58.01.01.211.

#### Permit Condition 6.3

The obligation to comply general compliance provision specifies that no permit condition is intended to relieve or exempt the permittee from compliance with applicable state and federal requirements, in accordance with IDAPA 58.01.01.212.01.

#### Permit Condition 6.4

The inspection and entry provision requires that the permittee allow DEQ inspection and entry pursuant to Idaho Code §39-108.

#### Permit Condition 6.5

The permit expiration construction and operation provision specifies that the permit expires if construction has not begun within two years of permit issuance or if construction has been suspended for a year in accordance with IDAPA 58.01.01.211.02.

#### Permit Condition 6.6

The notification of construction and operation provision requires that the permittee notify DEQ of the dates of construction and operation, in accordance with IDAPA 58.01.01.211.03.

#### Permit Condition 6.7

The performance testing notification of intent provision requires that the permittee notify DEQ at least 15 days prior to any performance test to provide DEQ the option to have an observer present, in accordance with IDAPA 58.01.01.157.03.

#### Permit Condition 6.8

The performance test protocol provision requires that any performance testing be conducted in accordance with the procedures of IDAPA 58.01.01.157, and encourages the permittee to submit a protocol to DEQ for approval prior to testing.

#### Permit Condition 6.9

The performance test report provision requires that the permittee report any performance test results to DEQ within 30 days of completion, in accordance with IDAPA 58.01.01.157.04-05.

#### Permit Condition 6.10

The monitoring and recordkeeping provision requires that the permittee maintain sufficient records to ensure compliance with permit conditions, in accordance with IDAPA 58.01.01.211.

#### Permit Condition 6.11

The excess emissions provision requires that the permittee follow the procedures required for excess emissions events, in accordance with IDAPA 58.01.01.130-136.

#### Permit Condition 6.12

The certification provision requires that a responsible official certify all documents submitted to DEQ, in accordance with IDAPA 58.01.01.123.

#### Permit Condition 6.13

The false statement provision requires that no person make false statements, representations, or certifications, in accordance with IDAPA 58.01.01.125.

#### Permit Condition 6.14

The tampering provision requires that no person render inaccurate any required monitoring device or method, in accordance with IDAPA 58.01.01.126.

#### Permit Condition 6.15

The transferability provision specifies that this permit to construct is transferable, in accordance with the procedures of IDAPA 58.01.01.209.06.

#### Permit Condition 6.16

The severability provision specifies that permit conditions are severable, in accordance with IDAPA 58.01.01.211.

## **PUBLIC REVIEW**

### ***Public Comment Opportunity***

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

## APPENDIX A – EMISSIONS INVENTORIES

Nampa Facility-Wide Potential to Emit

	Nebraska Boiler	Cleaver Brooks Boiler	Main Line Dryer	Main Line Fryer	Specialty Line Dryer	Specialty Line Fryer	Specialty Line Cooler	AMUs	Fugitive Sources	Total Emissions
Criteria Air Pollutants (tons per year)										
NOx	21.1	29.7	8.9	-	0.4	-	-	15.5	-	75.65
CO	35.5	24.9	7.5	-	0.7	-	-	13.1	-	81.66
SO2	0.3	0.18	0.1	-	0.01	-	-	0.1	-	0.58
PM10	3.2	2.3	3.2	40.9	1.8	31.9	1.8	1.2	2.3	88.61
VOC	2.3	1.6	37.1	7.6	1.1	13.8	1.1	0.9	-	65.5
Combined HAPs Total ( in pounds per year)										
Largest HAPs is Hexane at 3500 pound per year										
3668										

Emission Unit	Rating Capacity mmbtu/hr	Maximum Annual Rating Capacity mmbtu/hr	CO <sub>2</sub> (metric tons)	CH <sub>4</sub> (metric tons)	N <sub>2</sub> O (metric tons)	CO <sub>2</sub> Equivalent/yr (metric tons)
Nebraska Boiler	99.8	874,248	46,352.63	0.87	0.09	46,398
Cleaver Brooks Boiler	70	613,200	32,511.86	0.61	0.06	32,544
Main Line Dryer	21	183,960	9,753.56	0.18	0.02	9,763
Specialty Line Dryer	2	17,520	928.91	0.02	0.00	930
AMU (9 total)	36.7	321,492	17,045.51	0.32	0.03	17,062
<b>Total</b>		<b>2,010,420</b>	<b>106,592</b>	<b>2.01</b>	<b>0.201</b>	<b>117,612</b>

## **APPENDIX B – FACILITY DRAFT COMMENTS**

**The following comments were received from the facility on October 2, 2012:**

**Facility Comment:** Permit Condition 3.5

**Throughput Limits:** Permittee shall not exceed the combustion of 1.692 MM Btu of natural gas for any consecutive 12-month period.

Facility asked the amount to natural gas be changed to 1,692,000 MM Btu of natural gas as maximum combusted yearly.

**DEQ Response:** The error of 1.692 MM Btu was corrected to state 1,692,000 MM Btu of natural gas for any consecutive 12-month period.

**Facility Comment:** Permit Condition 4.3

This draft permit condition states ‘the permittee shall operate the WESP whenever a fryer is operating.’”

**DEQ Response:** This permit condition has been changed to read the same as in the previous PTC as “the permittee shall operate the WESP whenever any fryer has visible emissions that may exceed requirements of Permit Condition 2.7.”

**Facility Comment:** The facility responded to the Regulatory Analysis section of the Statement of Basis with the following table to clearly state the facility has two engines that are applicable to 40 CFR 63 Subpart ZZZZ.

<b>HAP Designation</b>	<b>Engine Type</b>	<b>Hp</b>	<b>Compliance Requirements</b>
Area	Emergency SI	24.0	40 CFR 63 Subpart ZZZZ
Area	Emergency SI	94.0	40 CFR 63 Subpart ZZZZ

**DEQ Response:** DEQ readdress this issue both with the PTC and the Statement of Basis to make clear the fact the facility does have two emergency spark ignition engines. DEQ made an effort to more clearly stated the specific requirements applicable to these engine as required by Subpart ZZZZ as stated in Section 5 of the PTC and the sections of the Statement of Basis.

## **APPENDIX C – PROCESSING FEE**

J. R. Simplot Company – Food Group – Nampa paid the processing fee of \$250 on October 10, 2012.