STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 N Hilton Street, Boise, ID 83706
(208) 373-0502

Brad Little, Governor
Jess Byrne, Director

June 21, 2021

Chris Cappo, Blackfoot Facility Manager
Blackfoot Facility of Basic American Foods
415 W. Collins Road
Blackfoot, ID 83221

RE: Facility ID No. 011-00012, Blackfoot Facility of Basic American Foods, Blackfoot
Tier I Operating Permit Administrative Amendment

Dear Mr. Cappo:

The Department of Environmental Quality (DEQ) is issuing amended Tier I Operating Permit No. T1-2018.0010 to Blackfoot Facility of Basic American Foods (BAF) at Blackfoot in accordance with IDAPA 58.01.01.381, Rules for the Control of Air Pollution in Idaho. This permit has been administratively amended by DEQ and is effective immediately.

Please be aware this permit replaces Tier I Operating Permit No. T1-2018.0010 issued on March 22, 2019, the terms and conditions of which shall no longer apply.

If you have questions regarding the amendment procedure or this notification, please contact Shawnee Chen at 208-373-0502 or shawnee.chen@deq.idaho.gov.

Sincerely,

Mike Simon
Stationary Source Bureau Chief
Air Quality Division

MS/syc

Permit No. T1-2018.0010 PROJ 62455

Enclosure

Air Quality

TIER I OPERATING PERMIT

Permittee	Blackfoot Facility of Basic American Foods
Permit Number	T1-2018.0010
Project ID	62455
Facility ID	011-00012
Facility Location	415 West Collins Road Blackfoot, ID 83221

Permit Authority

This permit (a) is issued according to the "Rules for the Control of Air Pollution in Idaho" (Rules) (IDAPA 58.01.01.300–386) (b) incorporates all applicable terms and conditions of prior air quality permits issued by the Idaho Department of Environmental Quality (DEQ) for the permitted source, unless the permittee emits toxic pollutants subject to state-only requirements pursuant to IDAPA 58.01.01.210 and the permittee elects not to incorporate those terms and conditions into this operating permit.

The permittee shall comply with the terms and conditions of this permit. The effective date of this permit is the date of signature by DEQ on this cover page.

Date Issued	June 21, 2021
Date Expires	March 22, 2024

Shawnee Chen, PE, Permit Writer

Mike Simon, Stationary Source Bureau Chief

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1 Acronyms, Units, and Chemical Nomenclature

acfm	actual cubic feet per minute
ASTM	American Society for Testing and Materials
BAF	Blackfoot Facility of Basic American Foods
BRC	Below Regulatory Concern or less than or equal to ten percent (10%) of applicable screening emission levels
Btu	British thermal units
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CEMS	continuous emission monitoring systems
CFR	Code of Federal Regulations
CMS	continuous monitoring systems
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	CO_2 equivalent emissions
COMS	continuous opacity monitoring systems
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
GHG	greenhouse gases
gr/dscf	grains (1 lb = 7,000 grains) per dry standard cubic foot
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
MRRR	Monitoring, Recordkeeping and Reporting Requirements
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO_2	nitrogen dioxide
NO_x	nitrogen oxides
NSPS	New Source Performance Standards
O&M	operation and maintenance
O_2	oxygen
PM	particulate matter
$PM_{2.5}$	particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers
PM_{10}	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
PW	process weight rate
RICE	reciprocating internal combustion engine
Rules	*Rules for the Control of Air Pollution in Idaho*
scf	standard cubic feet
SO_2	sulfur dioxide
SO_x	sulfur oxides
T/day	tons per calendar day

T/hr	tons per hour
T/yr	tons per consecutive 12-calendar month period
T1	Tier I operating permit
U.S.C.	United States Code
VOC	volatile organic compound

2 Permit Scope

Purpose

2.1 This Tier I operating permit establishes facility-wide requirements for Blackfoot Facility of Basic American Foods (BAF) in accordance with the Idaho State Implementation Plan control strategy and the Rules.

2.2 This Tier I operating permit incorporates the following permit(s):

- Permit to Construct No. P-2017.0031 issued January 18, 2019
- Permit to Construct No. P-2017.0011 issued April 16, 2021
- Permit to Construct No. P-2009.0043 issued July 27, 2018

2.3 This Tier I operating permit replaces the following permit(s):

- Tier I Operating Permit No. T1-2018.0010 issued March 22, 2019

Regulated Sources

Table 2.1 lists all sources of regulated emissions in this permit.

Table 2.1 Regulated Sources

Permit Section	Source	Control Equipment
5	Boiler 2A: Manufacturer: Victory Energy Model: VE-9772 Burner Model: low NOx burners, 30 ppmvd for NOx and 100 ppmvd for CO at 3% O_2 Manufacture Date: 2017 Heat input rating: 91.5 MMBtu/hr Estimated steam rate: 76,000 lb/hr at 250 psig Fuel: natural gas	Low NOx burners
	Boiler 3 (formerly Boiler 7): Manufacturer: Springfield Model: Model 52 Rated Heat Input: 39 MMBtu/hr Steam Rate: 30,000 lb/hr Fuels: natural gas and low sulfur distillate oil (0.05 wt%) Date installed: 1975	None
Process A		
6	DHQ: Cooler	None
	DHT: Dryer - 7 MMBtu/hr, natural gas-fired	None
	DHU: Dryer - 7 MMBtu/hr, natural gas-fired	None
	DHZ: Dryer - 6 MMBtu/hr, steam heated and natural gas-fired	None
Process B		
7	DUQ: Dryer - 7 MMBtu/hr, natural gas-fired	None
	DUT: Dryer - 7 MMBtu/hr, natural gas-fired	None
	DUV: Dryers - Two, each rated at 6 MMBtu/hr, steam heated and natural gas-fired	None
	DQA: Dryer - 7 MMBtu/hr, natural gas-fired	None
	DQB: Dryer - 7 MMBtu/hr, natural gas-fired	None

Permit Section	Source	Control Equipment
	Process C	
8	CIR: Dryer – Steam Heated	AAF International RotoClone W (Wet Dust Collector)
	CXX/CYY: Dryer – 6.05 MMBtu/hr pre-heater, 4.4 MMBtu/hr front dryer, 6.6 MMBtu/hr rear dryer, all natural gas-fired	None
	CHX: Dryer –10.3 MMBtu/hr, steam heated and natural gas-fired, with a 2.9 MMBtu/hr pre-heater, natural gas-fired	None
	HEB: Dryer - 6 MMBtu/hr, natural gas-fired	None
	CBB: Dryer – 1.5 MMBtu/hr, natural gas-fired	None
	CNV: Dryer - 12 MMBtu/hr, natural gas-fired	None
	CNW: Dryer - 12 MMBtu/hr, natural gas-fired	None
	CTU: Dryer – Steam heated	None
	CTZ: Dryer – 5.75 MMBtu/hr, natural gas-fired	Low-NOx burner
	Process C-8	
9	Pre-dryer: Manufacturer: Industrial Metal Enterprises Model: custom Manufacture date: 4/1/2017 Max. production: 70,000 lb/day finished product Fuel: natural gas First stage: Burner model: Low NOx burner, 25 ppmvd @ 3% O_2 Manufacturer: Winnox Eclipse Model: CROSSFIRE Heat input rating: 6.0 MMBtu/hr Second stage: Burner model: Low NOx burner, 20 ppmvd @ 3% O_2 Manufacturer: Winnox Eclipse Model: WX0200 Heat input rating: 2.0 MMBtu/hr	None
	Dryer: Manufacturer: Buhler Aeroglide Model: C1 144-132 RGX Manufacture date: 4/1/2017 Max. production: 70,000 lb/day finished product Fuel: natural gas Burner model: Low-NOx burner, 10 ppmvd @ 3% O_2 Manufacturer: Winnox Eclipse Model: WX0200 Heat input rating: 5.0 MMBtu/hr	Wet Venturi Scrubber Manufacturer: EnviroCare Model: MicroMist Inlet gas flow: 19,300 acfm $PM_{10}/PM_{2.5}$ control efficiency: 75.0%
	Air Makeup Unit: Manufacturer: Reyco Model: Ventpac 60 Burner Model: Low NOx burner, 25 ppmvd @ 3% O_2 Burner Manufacturer: Winnox Eclipse Model: CROSSFIRE Manufacture Date: 4/1/2017 Heat input rating: 5.0 MMBtu/hr Fuel: natural gas	None
10	Plant Space Heaters: 77.6 MMBtu/hr, natural gas-fired	None
11	Emergency Engine: 1962 RICE, propane-fired	None

3 Facility-Wide Conditions

Table 3.1 contains a summary of requirements that apply generally to emissions units at BAF.

Table 3.1 Applicable Requirements Summary[(a)]

Permit Conditions	Parameter	Limit/Standard Summary	Applicable Requirements Reference	Monitoring, Recordkeeping, and Reporting Requirements
3.1-3.4	Fugitive Dust	Reasonable control	IDAPA 58.01.01.650–651	3.2–3.4, 3.24, 3.29
3.5, 3.6	Odors	Reasonable control	IDAPA 58.01.01.775–776	3.6, 3.24, 3.29
3.7-3.9	Visible Emissions	20% opacity for no more than 3 minutes in any 60-minute period	IDAPA 58.01.01.625	3.8, 3.9, 3.24, 3.29
3.10-3.14	Excess Emissions	Compliance with IDAPA 58.01.01.130-136	IDAPA 58.01.01.130–136	3.10-3.14, 3.24, 3.29
3.15	PM	Natural gas only 0.015 gr/dscf at 3% O_2 Fuel oil only 0.05 gr/dscf at 3% O_2 Coal only 0.05 gr/dscf at 8% O_2 Wood only 0.08 gr/dscf at 8% O_2	IDAPA 58.01.01.676–677	(see Emissions Unit/Source Name Section)
3.16, 3.17	Sulfur Content	ASTM grade No. 1 fuel oil ≤ 0.3% by weight ASTM grade No. 2 fuel oil ≤ 0.5% by weight	IDAPA 58.01.01.725	3.17, 3.24, 3.29
3.18	Open Burning	Compliance with IDAPA 58.01.01.600-623	IDAPA 58.01.01.600–623	3.18, 3.24, 3.29
3.19	Asbestos	Compliance with 40 CFR 61, Subpart M	40 CFR 61, Subpart M	3.19, 3.24, 3.29
3.20	Accidental Release Prevention	Compliance with 40 CFR 68	40 CFR 68	3.20, 3.24, 3.29
3.21	Recycling and Emissions Reductions	Compliance with 40 CFR 82, Subpart F	40 CFR 82, Subpart F	3.21, 3.24, 3.29
3.22, 3.23	NSPS/NESHAP General Provisions	Compliance with 40 CFR 60/63, Subpart A	IDAPA 58.01.01.107.03	3.22, 3.23, 3.24, 3.29
3.24	Monitoring and Recordkeeping	Maintenance of required records	IDAPA 58.01.01.322.06	3.24, 3.29
3.25-3.28	Testing	Compliance testing	IDAPA 58.01.01.157	3.25–3.28, 3.24, 3.29
3.29	Reports and Certifications	Submittal of required reports, notifications, and certifications	IDAPA 58.01.01.322.08	3.29
3.30	Incorporation of Federal Requirements by Reference	Compliance with applicable federal requirements referenced	IDAPA 58.01.01.107	3.30

a) The table is for reference only. Specific requirements are set forth in individual permit conditions below.

Fugitive Dust

3.1 All reasonable precautions shall be taken to prevent particulate matter (PM) from becoming airborne in accordance with IDAPA 58.01.01.650–651.

[IDAPA 58.01.01.650–651, 4/11/15]

3.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (e.g., water, chemical dust suppressants) to reasonably control fugitive emissions.

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

3.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receiving of a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, 07, 5/1/1994]

3.4 The permittee shall conduct a schedule, no less frequently than quarterly BAF facility wide inspection of potential sources of fugitive emissions during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, 07, 5/1/1994]

Odors

3.5 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), 5/1/1994]

3.6 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, 07 (state only), 5/1/1994]

Visible Emissions

3.7 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, NOx, 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, 4/5/2000]

3.8 The permittee shall conduct a schedule, no less frequently than quarterly, BAF facility-wide inspection of all potential sources of visible emissions, including any applicable insignificant activities, during daylight hours and under normal operating conditions. Sources that are monitored using a continuous opacity monitoring system (COMS) are not required to comply with this permit condition. The inspection shall consist of a see/no see evaluation for each potential source of visible emissions. If any visible emissions are present from any point of emission, the permittee shall either:

a) Take appropriate corrective action as expeditiously as practicable to eliminate the visible emissions. Within 24 hours of the initial see/no see evaluation and after the corrective action, the permittee shall conduct a see/no see evaluation of the emissions point in question. If the visible emissions are not eliminated, the permittee shall comply with b).

- or -

b) Perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20%, as measured using Method 9, for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective actions and report the period or periods as an excess emission in the annual compliance certification and in accordance with IDAPA 58.01.01.130–136.

[IDAPA 58.01.01.322.06, 5/1/1994]

3.9 The permittee shall maintain records of the results of each visible emission inspection and each opacity test when conducted. The records shall include, 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 (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

[IDAPA 58.01.01.322.07, 5/1/1994]

Excess Emissions

Excess Emissions-General

3.10 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 (Permit Conditions 3.10 through 3.14) and the regulations of IDAPA 58.01.01.130–136.

During an excess emissions event, the permittee shall, with all practicable speed, initiate and complete appropriate and reasonable action to correct the conditions causing the excess emissions event; to reduce the frequency of occurrence of such events; to minimize the amount by which the emission standard is exceeded; and shall, as provided below or upon request of DEQ, submit a full report of such occurrence, including a statement of all known causes, and of the scheduling and nature of the actions to be taken.

[IDAPA 58.01.01.132, 4/5/2000]

Excess Emissions-Startup, Shutdown, and Scheduled Maintenance

3.11 In all cases where startup, shutdown, or scheduled maintenance of any equipment or emission unit is expected to result or results in an excess emissions event, the permittee shall demonstrate compliance with IDAPA 58.01.01.133.01(a) through (d), including, but not limited to, the following:

- Prohibiting any scheduled startup, shutdown, or maintenance resulting in excess emissions shall occur during any period in which an Atmospheric Stagnation Advisory or a Wood Stove Curtailment Advisory has been declared by DEQ.
- Notifying DEQ of the excess emissions event as soon as reasonably possible, but no later than two hours prior to, the start of the event, unless the permittee demonstrates to DEQ's satisfaction that a shorter advance notice was necessary.
- Reporting and recording the information required pursuant to the excess emissions reporting and recordkeeping requirements (Permit Conditions 3.13 and 3.14) and IDAPA 58.01.01.135 and 136 for each excess emissions event due to startup, shutdown, or scheduled maintenance.

[IDAPA 58.01.01.133, 4/11/2006]

Excess Emissions-Upset, Breakdown, or Safety Measures

3.12 In all cases where upset or breakdown of equipment or an emissions unit, or the initiation of safety measures, results or may result in an excess emissions event, the permittee shall demonstrate compliance with IDAPA 58.01.01.134.01(a) and (b) and the following:

- Immediately undertake all appropriate measures to reduce and, to the extent possible, eliminate excess emissions resulting from the event and to minimize the impact of such excess emissions on the ambient air quality and public health.
- Notify DEQ of any upset, breakdown, or safety event that results in excess emissions. Such notification shall identify the time, specific location, equipment or emissions unit involved, and (to the extent known) the cause(s) of the occurrence. The notification shall be given as soon as reasonably possible, but no later than 24 hours after the event, unless the permittee demonstrates to DEQ's satisfaction that the longer reporting period was necessary.
- Report and record the information required pursuant to the excess emissions reporting and recordkeeping facility wide conditions (Permit Conditions 3.13 and 3.14) and IDAPA 58.01.01.135 and 136 for each excess emissions event caused by an upset, breakdown, or safety measure.
- During any period of excess emissions caused by upset, breakdown, or operation under facility safety measures, DEQ may require the permittee to immediately reduce or cease operation of the equipment or emissions unit causing the period until such time as the condition causing the excess has been corrected or brought under control. Such action by DEQ shall be taken upon consideration of the factors listed in IDAPA 58.01.01.134.03 and after consultation with the permittee.

[IDAPA 58.01.01.134, 4/11/2006]

Excess Emissions-Reporting and Recordkeeping

3.13 The permittee shall submit a written report to DEQ for each excess emissions event, no later than 15 days after the beginning of such an event. Each report shall contain the information specified in IDAPA 58.01.01.135.02.

[IDAPA 58.01.01.135, 4/11/2006]

3.14 The permittee shall maintain excess emissions records at the facility for the most recent five calendar-year period. The excess emissions records shall be made available to DEQ upon request and shall include the information requested by IDAPA 58.01.01.136.03(a) and (b) as summarized in the following:

- An excess emissions log book for each emissions unit or piece of equipment containing copies of all reports that have been submitted to DEQ pursuant to IDAPA 58.01.01.135 for the particular emissions unit or equipment; and
- Copies of all startup, shutdown, and scheduled maintenance procedures and upset, breakdown, or safety preventative maintenance plans that have been developed by the permittee in accordance with IDAPA 58.01.01.133 and 134, and facility records as necessary to demonstrate compliance with such procedures and plans.

[IDAPA 58.01.01.136, 4/5/2000]

Fuel-Burning Equipment

3.15 The permittee shall not discharge to the atmosphere from any fuel-burning equipment PM in excess of 0.015 grains per dry standard cubic foot (gr/dscf) of effluent gas corrected to 3% oxygen by volume for gas, 0.050 gr/dscf of effluent gas corrected to 3% oxygen by volume for liquid, 0.050 gr/dscf of effluent gas corrected to 8% oxygen by volume for coal, and 0.080 gr/dscf of effluent gas corrected to 8% oxygen by volume for wood products.

[IDAPA 58.01.01.676–677, 5/1/1994]

Sulfur Content

3.16 The permittee shall not sell, distribute, use, or make available for use any of the following:

- Distillate fuel oil containing more than the following percentages of sulfur:
  - ASTM Grade 1 fuel oil, 0.3% by weight
  - ASTM Grade 2 fuel oil, 0.5% by weight
- DEQ may approve an exemption from these fuel sulfur content requirements (IDAPA 58.01.01.725.01 725.04) if the permittee demonstrates that, through control measures or other means, SO_2 emissions are equal to or less than those resulting from the combustion of fuels complying with these limitations.

[IDAPA 58.01.01.725, 4/11/2015]

3.17 The permittee shall maintain documentation of supplier verification of distillate fuel oil sulfur content on an as received basis.

[IDAPA 58.01.01.322.07, 5/1/1994]

Open Burning

3.18 The permittee shall comply with the "Rules for Control of Open Burning" (IDAPA 58.01.01.600–623).

[IDAPA 58.01.01.600–623, 3/29/2012]

Asbestos

3.19 NESHAP 40 CFR 61, Subpart M—National Emission Standard for 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]

Accidental Release Prevention

3.20 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, 4/6/2005; 40 CFR 68.215(a)(ii)]

Recycling and Emissions Reductions

3.21 40 CFR Part 82—Protection of Stratospheric Ozone

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]

NSPS/NESHAP General Provisions

3.22 NSPS 40 CFR 60, Subpart A-General Provisions

The permittee shall comply with the applicable requirements of 40 CFR 60, Subpart A-"General Provisions"-in accordance with 40 CFR 60.1. A summary of requirements for affected facilities is provided in Table 3.2.

Table 3.2 NSPS 40 CFR 60, Subpart A - Summary of General Provisions

Section	Subject	Summary of Section Requirements
60.4	Address	• All requests, reports, applications, submittals, and other communications associated with 40 CFR 60, Subpart(s) shall be submitted to: Pocatello Regional Office 444 Hospital Way, #300 Pocatello, ID 83201
60.7(a), (b), and (f)	Notification and Recordkeeping	• Notification shall be furnished of commencement of construction postmarked no later than 30 days of such date. • Notification shall be furnished of initial startup postmarked within 15 days of such date. • Notification shall be furnished of any physical or operational change that may increase emissions postmarked 60 days before the change is made. • Records shall be maintained of the occurrence and duration of any startup, shutdown or malfunction; any malfunction of the air pollution control equipment; or any periods during which a CMS or monitoring device is inoperative. • Records shall be maintained, in a permanent form suitable for inspection, of all measurements, performance testing measurements, calibration checks, adjustments and maintenance performed, and other required information. Records shall be maintained for a period of two years following the date of such measurements, maintenance, reports, and records.
60.8	Performance Tests	• At least 30 days prior notice of any performance test shall be provided to afford the opportunity to have an observer to be present. • Within 60 days of achieving the maximum production rate, but not later 180 days after initial startup, performance test(s) shall be conducted and a written report of the results of such test(s) furnished. • Performance testing facilities shall be provided as follows: Sampling ports adequate for test methods applicable to such facility. Safe sampling platform(s). Safe access to sampling platform(s). Utilities for sampling and testing equipment. • Performance tests shall be conducted and data reduced in accordance with 40 CFR 60.8(b), (c), and (f)
60.11(a), (d), (f), and (g)	Compliance with Standards and Maintenance Requirements	• When performance tests are required, compliance with standards is determined by methods and procedures established by 40 CFR 60.8. • At all times, including periods of startup, shutdown, and malfunction, the owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. • For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any standard, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with

Section	Subject	Summary of Section Requirements
		applicable requirements if the appropriate performance or compliance test or procedure had been performed.
60.11(b), (c), and (e)	Compliance with Standards and Maintenance Requirements (Opacity)	• Compliance with opacity standards shall be determined by Method 9 in Appendix A of 40 CFR 60. The permittee may elect to use COM measurements in lieu of Method 9, provided notification is made at least 30 days before the performance test. • The opacity standards shall apply at all times except during periods of startup, shutdown, malfunction, and as otherwise provided. • Opacity observations shall be conducted concurrently with the initial performance test required in 40 CFR 60.8 in accordance with the requirements and exceptions in 40 CFR 60.11(e).
60.12	Circumvention	• No permittee shall build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard.
60.13	Monitoring Requirements (CMS)	• All CMS and monitoring devices shall be installed and operational prior to conducting performance tests required by 40 CFR 60.8. • A performance evaluation of the COMS or CEMS shall be conducted before or during any performance test and a written report of the results of the performance evaluation furnished. Reporting requirements include submitting performance evaluations reports within 60 days of the evaluations required by this section, and submitting results of the performance evaluations for the COM within 10 days before a performance test, if using a COM to determine compliance with opacity during a performance test instead of Method 9. • The zero and span calibration drifts must be checked at least once daily and adjusted in accordance with the requirements in 40 CFR 60.13(d). • The zero and upscale (span) calibration drifts of a COMS must be automatically, intrinsic to the opacity monitor, checked at least once daily. • Except for system breakdowns, repairs, calibration checks, and zero and span adjustments, all CMS shall be in continuous operation and shall meet minimum frequency of operation requirements as specified in 40 CFR 60.13(e). • All CMS or monitoring devices shall be installed such that representative measurements of emissions or process parameters from the affected facility are obtained. CMS shall be located and installed in accordance with the requirements in 40 CFR 60.13(f) and (g). • Data shall be reduced and computed in accordance with the procedures in 40 CFR 60.13(h), (i), and (j).
60.14	Modification	• A physical or operational change which results in an increase in the emission rate to the atmosphere or any pollutant to which a standard applies shall be considered a modification, and upon modification an existing facility shall become an affected facility in accordance with the requirements and exemptions in 40 CFR 60.14. • Within 180 days of the completion of any physical or operational change, compliance with all applicable standards must be achieved.
60.15	Reconstruction	• An existing facility, upon reconstruction, becomes an affected facility, irrespective of any change in emission rate in accordance with the requirements of 40 CFR 60.15.

[40 CFR 60, Subpart A]

3.23 NESHAP 40 CFR 63, Subpart A—General Provision

The permittee shall comply with the requirements of 40 CFR 63, Subpart A—"General Provisions." A summary of applicable requirements for affected sources is provided in Table 3.3.

Table 3.3 NSPS 40 CFR 63, Subpart A – Summary of General Provisions for Affected Sources

Section	Subject	Summary of Section Requirements
63.13	Address	• All requests, reports, applications, submittals, and other communications associated with 40 CFR 63, Subpart(s) shall be submitted to: Director Air and Waste US EPA 1200 Sixth Ave. Seattle, WA 98101 Pocatello Regional Office 444 Hospital Way, #300 Pocatello, ID 83201
63.4(a)	Prohibited Activities	• No permittee must operate any affected source in violation of the requirements of 40 CFR 63 in accordance with 40 CFR 63.4(a). No permittee subject to the provisions of this part shall fail to keep records, notify, report, or revise reports as required under this part.
63.4(b)	Circumvention/ Fragmentation	• No permittee shall build, erect, install or use any article, machine, equipment, or process to conceal an emission that would otherwise constitute noncompliance with a relevant standard. • Fragmentation which divides ownership of an operation, within the same facility among various owners where there is no real change in control, will not affect applicability in accordance with 40 CFR 63.4(c).
63.6(b) and (c)	Compliance Dates	• The permittee of any new or reconstructed source must comply with the relevant standard as specified in 40 CFR 63.6(b). ◦ The permittee of a source that has an initial startup before the effective date of a relevant standard must comply not later than the standard's effective date in accordance with 40 CFR 63.6(b)(1). ◦ The permittee of a source that has an initial startup after the effective date of a relevant standard must comply upon startup of the source in accordance with 40 CFR 63.6(b)(2). • The permittee of any existing sources must comply with the relevant standard by the compliance date established in the applicable subpart or as specified in 40 CFR 63.6(c). The permittee of an area source that increases its emissions of hazardous air pollutants such that the source becomes a major source shall be subject to relevant standards for existing sources in accordance with 40 CFR 63.6(c)(5).
63.6(e) and (f)	Compliance with Standards and Maintenance Requirements (Non-Opacity)	• At all times, including periods of startup, shutdown, and malfunction, the permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions in accordance with 40 CFR 63.6(e). • The permittee of an affected source must develop a written startup, shutdown, and malfunction plan and a program of corrective action for malfunctioning process, air pollution control, and monitoring equipment used to comply with the relevant standard in accordance with 40 CFR 63.6(e). The permittee must maintain the current plan at the affected source and must make the plan available upon request. If the plan fails to address or inadequately addresses a malfunction, the permittee must revise the plan within 45 days after the event. • The permittee must record and report actions taken during a startup, shutdown, or malfunction in accordance with the requirements in 40 CFR 63.6(e). The permittee shall confirm that actions taken during the relevant reporting period during periods of startup, shutdown, and malfunction were consistent with the plan in the semiannual startup, shutdown, and malfunction report. • Non-opacity emission standards shall apply at all times except during periods of startup, shutdown, and malfunction, and as otherwise specified, in accordance with 40 CFR 63.6(f).

Table 3.3 NSPS 40 CFR 63, Subpart A – Summary of General Provisions for Affected Sources (continued)

Section	Subject	Summary of Section Requirements
63.7	Performance Testing Requirements	• If required to do performance testing, the permittee must perform such tests within 180 days of the compliance date in accordance with 40 CFR 63.7(a). • The permittee must notify in writing of the intention to conduct a performance test at least 60 calendar days before the performance test is initially scheduled to begin to allow review of the site-specific test plan and to have an observer present during the test in accordance with 40 CFR 63.7(b). • Before conducting a required performance test, the permittee shall develop and, if requested, shall submit a site-specific test plan for approval in accordance with 40 CFR 63.7(c). The test plan shall include a test program summary, the test schedule, data quality objectives, and both an internal and external quality assurance (QA) program. • If required to do performance testing, the permittee shall provide performance testing facilities in accordance with 40 CFR 63.7(d): o Sampling ports adequate for test methods applicable to such source. o Safe sampling platform(s); o Safe access to sampling platform(s); o Utilities for sampling and testing equipment; and o Any other facilities deemed necessary for safe and adequate testing of a source. • Performance tests shall be conducted and data reduced in accordance with 40 CFR 63.7(e) and (f). • The permittee shall report the results of the performance test before the close of business on the 60th day following the completion of the test, unless specified or approved otherwise in accordance with 40 CFR 63.7(g).
63.9	Notification Requirements	• The permittee of an affected source that has an initial startup before the effective date of a relevant standard shall notify in writing that the source is subject to the relevant standard, in accordance with 40 CFR 63.9(b)(2). The notification, which shall be submitted not later than 120 calendar days after the effective date of the relevant standard (or within 120 calendar days after the source becomes subject to the relevant standard), shall provide the following information: o The name and address of the permittee; o The address (i.e., physical location) of the affected source; o An identification of the relevant standard, or other requirement, that is the basis of the notification and the source's compliance date; o A brief description of the nature, size, design, and method of operation of the source and an identification of the types of emission points within the affected source subject to the relevant standard and types of hazardous air pollutants emitted; and o A statement of whether the affected source is a major source or an area source. • The permittee of a new or reconstructed major affected source for which an application for approval of construction or reconstruction is required must provide the following information in writing in accordance with 40 CFR 63.9(b)(4): o A notification of intention to construct a new major-emitting affected source, reconstruct a major-emitting affected source, or reconstruct a major source such that the source becomes a major-emitting affected source; and o A notification of the actual date of startup of the source delivered or postmarked within 15 calendar days after that date. • The permittee of a new or reconstructed affected source for which an application for approval of construction or reconstruction is not required must provide the following information in writing in accordance with 40 CFR 63.9(b)(5): o A notification of intention to construct a new affected source, reconstruct an affected source, or reconstruct a source such that the source becomes an affected source; and o A notification of the actual date of startup of the source delivered or postmarked within 15 calendar days after that date. o Unless the permittee has requested and received prior permission, the notification must include the information required in the application for approval of construction or reconstruction as specified in 40 CFR 63.5(d)(1).

Table 3.3 NSPS 40 CFR 63, Subpart A – Summary of General Provisions for Affected Sources (continued)

Section	Subject	Summary of Section Requirements
63.9	Notification Requirements (continued)	• The permittee shall notify in writing of his or her intention to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin to allow the opportunity to review and approve the site-specific test plan required by 40 CFR 63.7(c), and to have an observer present during the test. • The permittee of an affected source shall notify in writing of the anticipated date for conducting the opacity or visible emission observations in accordance with 40 CFR 63.9(f), if such observations are required. • Each time a notification of compliance status is required under this part, the permittee of such source shall submit a notification of compliance status in accordance with 40 CFR 63.9(h)(2)(i). The notification shall list: o The methods that were used to determine compliance; o The results of any performance tests, opacity or visible emission observations, continuous monitoring system (CMS) performance evaluations, and/or other monitoring procedures or methods that were conducted; o The methods that will be used for determining continuing compliance, including a description of monitoring and reporting requirements and test methods; o The type and quantity of hazardous air pollutants emitted by the source (or surrogate pollutants if specified in the relevant standard), reported in units and averaging times and in accordance with the test methods specified in the relevant standard; o If the relevant standard applies to both major and area sources, an analysis demonstrating whether the affected source is a major source (using the emissions data generated for this notification); o A description of the air pollution control equipment (or method) for each emission point, including each control device (or method) for each hazardous air pollutant and the control efficiency (percent) for each control device (or method); and o A statement by the permittee of the affected existing, new, or reconstructed source as to whether the source has complied with the relevant standard or other requirements. • The notification must be sent before the close of business on the 60th day following the completion of the relevant compliance demonstration activity specified in the relevant standard unless otherwise specified in accordance with 40 CFR 63.9(h)(2)(ii). If no performance test is required but opacity or visible emission observations are required to demonstrate compliance with a standard, the notification shall be sent before close of business on the 30th day following the completion of the observations. • Each time a notification of compliance status is required under this part, the permittee of such source shall submit the notification of compliance status following completion of the relevant compliance demonstration activity specified. • If a permittee submits estimates or preliminary information in an application in place of the actual emissions data or control efficiencies, the permittee shall submit the actual emissions data and other correct information as soon as available but no later than with the initial notification of compliance status required in this section in accordance with 40 CFR 63.9(h)(5). • Any change in the information already provided under this section shall be provided in writing within 15 calendar days after the change in accordance with 40 CFR 63.9(j).

Table 3.3 NSPS 40 CFR 63, Subpart A – Summary of General Provisions for Affected Sources (continued)

Section	Subject	Summary of Section Requirements
63.10	Recordkeeping and Reporting Requirements	• The permittee shall maintain files of all required information recorded in a form suitable and readily available for expeditious inspection and review in accordance with 40 CFR 63.10(b)(1). The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained on site. • The permittee shall maintain relevant records of the following in accordance with 40 CFR 63.10(b)(2); o The occurrence and duration of each startup or shutdown when the startup or shutdown causes the source to exceed any applicable emission limitation in the relevant emission standards; o The occurrence and duration of each malfunction of operation or the required air pollution control and monitoring equipment; o All required maintenance performed on the air pollution control and monitoring equipment; o Actions taken during periods of startup or shutdown when the source exceeded applicable emission limitations in a relevant standard and when the actions taken are different from the procedures specified in the affected source's startup, shutdown, and malfunction plan; or o Actions taken during periods of malfunction when the actions taken are different from the procedures specified in the affected source's startup, shutdown, and malfunction plan; o All information necessary, including actions taken, to demonstrate conformance with the affected source's startup, shutdown, and malfunction plan (see 40 CFR 63.6(e)(3)) when all actions taken during periods of startup or shutdown (and the startup or shutdown causes the source to exceed any applicable emission limitation in the relevant emission standards), and malfunction (including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan. (The information needed to demonstrate conformance with the startup, shutdown, and malfunction plan may be recorded using a "checklist," or some other effective form of recordkeeping, in order to minimize the recordkeeping burden for conforming events); o Each period during which a CMS is malfunctioning or inoperative (including out-of-control periods); o All required measurements needed to demonstrate compliance with a relevant standard (including, but not limited to, 15-minute averages of CMS data, raw performance testing measurements, and raw performance evaluation measurements, that support data that the source is required to report); o All results of performance tests, CMS performance evaluations, and opacity and visible emission observations; o All measurements as may be necessary to determine the conditions of performance tests and performance evaluations; o All CMS calibration checks; o All adjustments and maintenance performed on CMS; o All emission levels relative to the criterion for obtaining permission to use an alternative to the relative accuracy test, if the source has been granted such permission under 40 CFR 63.8(f)(6); and o All documentation supporting initial notifications and notifications of compliance status under 40 CFR 63.9. • If an permittee determines that his or her stationary source that emits one or more HAP, and that stationary source is in the source category regulated by the relevant standard, but that source is not subject to a relevant standard because of limitations on the source's potential to emit or an exclusion, the permittee must keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first in accordance with 40 CFR 63.10(b).

[40 CFR 63, Subpart A]

Monitoring and Recordkeeping

3.24 The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this operating permit. Monitoring records 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, 5/1/1994]

Performance Testing

3.25 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.

3.26 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.
- The proposed schedule for conducting and reporting the test.

[IDAPA 58.01.01.157, 4/11/2015; IDAPA 58.01.01.322.06, 08.a, 09, 4/5/2000]

3.27 Within 60 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

3.28 The proposed test date(s), test date rescheduling notice(s), compliance test report, and all other correspondence shall be sent to the DEQ address specified in the “Reports and Certifications” facility wide condition (Permit Condition 3.29).

[IDAPA 58.01.01.157, 4/11/2015; IDAPA 58.01.01.322.06, 08.a, 09, 4/5/2000]

Reports and Certifications

3.29 All periodic reports and certifications required by this permit shall be submitted to DEQ within 30 days of the end of each specified reporting period. Excess emissions reports and notifications shall be submitted in accordance with IDAPA 58.01.01.130–136. Reports, certifications, and notifications shall be submitted to:

Air Quality Permit Compliance
Department of Environmental Quality
Pocatello Regional Office
444 Hospital Way, #300
Pocatello, ID 83201
Phone: (208) 236-6160
Fax: (208) 236-6168

The periodic compliance certification required in the general provisions (General Provision 13.22) shall also be submitted within 30 days of the end of the specified reporting period to:

Part 70 Operating Permit Program
U.S. EPA Region 10, Mail Stop: OAW-150
1200 Sixth Ave., Suite 155
Seattle, WA 98101

[IDAPA 58.01.01.322.08, 11, 4/5/2000]

Incorporation of Federal Requirements by Reference

3.30 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. Documents include, but are not limited to:

- Standards of Performance for New Stationary Sources (NSPS), 40 CFR Part 60 Subpart Dc
- National Emission Standards for Hazardous Air Pollutants for Source Categories (NESHAP), 40 CFR Part 63 Subpart ZZZZ and Subpart JJJJJJ

For permit conditions referencing or cited in accordance with any document incorporated by reference (including permit conditions identified as NSPS or NESHAP), should there be any conflict between the requirements of the permit condition and the requirements of the document, the requirements of the document shall govern, including any amendments to that regulation.

[IDAPA 58.01.01.107, 3/29/2017]

4 Facility Wide Carbon Monoxide Emission Limit

Summary Description

The following is a narrative description of the Facility Wide Carbon Monoxide Emissions Limit. This description is for informational purposes only. Specific requirements are set forth in individual permit conditions below.

Blackfoot Facility of Basic American Foods (BAF), a division of Basic American, Inc. is a manufacturer of dried food products and is located at 415 West Collins Road, Blackfoot. Basic American Potato Company, Inc. (BAPCI) is a potato processing company and is located at 409 West Collins Road, Blackfoot, Idaho. Because BAPCI and BAF have the same owner, are adjacent, and have same first two digits of Standard Industrial Classification (SIC) code, the two plants are considered as one source or one facility for NSR and Title V program purposes.

Table 4.1 contains only a summary of the requirements that apply to the facility-wide carbon monoxide (CO) emissions. Specific permit requirements are listed below.

Table 4.1 Applicable Requirements Summary [(a)]

Permit Conditions	Parameter	Limit/Standard Summary	Applicable Requirements Reference	Operating, Monitoring, and Recordkeeping Requirements
4.1	CO	195 T/yr	40 CFR 52.21(b)(1) PTC No. P-2017.0031	4.2, 4.3, 4.4

a) The table is for reference only. Specific requirements are set forth in individual permit conditions below.

Emission Limits

4.1 Emissions Limits

The facility-wide carbon monoxide (CO) emissions shall not exceed 195 T/yr, based on a 12-month rolling period. The facility means BAF and BAPCI. In other sections of this permit, "facility" refers only to BAF.

[IDAPA 58.01.01.322(a), 4/5/2000; PTC No. P-2017.0031, 1/18/2019]

Monitoring and Recordkeeping Requirements

4.2 CO Limit Compliance

For BAF and BAPCI, the permittee shall calculate and record estimated total CO emissions for all combustion sources each calendar month, based on fuel consumption, steam production, or heat input rating, using the emission factors provided in the following table, or other DEQ approved method. Emission factors in the following table may be updated, with concurrence of DEQ. To update an emission factor, the permittee shall submit to DEQ the proposed revised emission factor and the basis for the revisions. Upon approval by DEQ, the updated emission factor shall replace the corresponding emissions factor in the following table. Records shall be maintained on site for a period of at least five years and shall be made available to DEQ representatives upon request.

[IDAPA 58.01.01.322(a), 4/5/2000; PTC No. P-2017.0031, 1/18/2019]

Table 4.2 CO Emissions Factors

Production Process	Stack Identification Code	Emissions Factor	
		Emissions Factor	Units
Blackfoot Facility of Basic American Foods[1]			
Boiler	Boiler 2A stack	0.074 [2]	lbs-CO/MMBtu
Boiler	Boiler 3 stack	0.107	lb-CO/1,000 lbs steam
A	DHT	0.400	lbs-CO/MMBtu
A	DHU	0.400	lbs-CO/MMBtu
A	DHZ	0.260	lbs-CO/MMBtu
B	DUQ	0.400	lbs-CO/MMBtu
B	DUT	0.400	lbs-CO/MMBtu
B	DQA	0.400	lbs-CO/MMBtu
B	DQB	0.400	lbs-CO/MMBtu
B	DUV	0.260	lbs-CO/MMBtu
C	AEV	0.260	lbs-CO/MMBtu
C	CTZ	0.016	lbs-CO/MMBtu
C	CXX	0.254	lbs-CO/MMBtu
C	CYY	0.313	lbs-CO/MMBtu
C	CHX	0.260	lbs-CO/MMBtu
C	CHY	0.260	lbs-CO/MMBtu
C	CHZ	0.260	lbs-CO/MMBtu
C	HEB	0.043	lbs-CO/MMBtu
C	HNL	0.043	lbs-CO/MMBtu
C	CBB	0.260	lbs-CO/MMBtu
C	CNV	0.260	lbs-CO/MMBtu
C	CNW	0.260	lbs-CO/MMBtu
C	CTQ	0.260	lbs-CO/MMBtu
C	CTR	0.260	lbs-CO/MMBtu
C	CTS	0.260	lbs-CO/MMBtu
C	CTT	0.260	lbs-CO/MMBtu
C	TCD	0.260	lbs-CO/MMBtu
C	TAC	0.260	lbs-CO/MMBtu
C	TAH	0.260	lbs-CO/MMBtu
C-8 [5]	Pre-dryer stack, Dryer stack	0.0824 [3, 4]	lbs-CO/MMBtu
Plant	Heaters	0.082[3]	lbs-CO/MMBtu
Blackfoot Basic American Potato Company, Inc.[6]			
Boilers	Each Processing Boiler West Processing Boiler Dehydration North Boiler Dehydration South Boiler	0.0824 [3]	lbs-CO/MMBtu
Dryers	Dehydration Air Dryers 1, 2, 3, and Dehydration Bin Dryer	0.0824 [3, 4]	lbs-CO/MMBtu
Heaters	Air Makeups and Room Heater	0.0824 [3]	lbs-CO/MMBtu

1) Taken from Appendix D of PTC No. P-2009.0043 project 0043 issued on January 20, 2011.
2) Taken from Table D-3 of the application, based on manufacturer's data of CO concentration of 100 ppm @ 3% O_2.
3) AP-42, Table 1.4-1. Converted to lb/MMBtu assuming 1020 Btu/scf as natural gas heating value.
4) Due to the uncertainty of CO emissions from these dryers, source testing could be considered when there is a regulatory concern.
5) Information taken from PTC No. P-2017.0011 project 61851, issued on 1/18/2019.
6) Taken from Tier I operating permit T1-2008.0077 project 61650, issued January 29, 2016.

[IDAPA 58.01.01.322(a), 4/5/2000; PTC No. P-2017.0031, 1/18/2019]

4.3 Annual CO requirement

The permittee shall calculate rolling 12-month total estimated emissions of CO for each calendar month. Emissions totals shall be available within 30 days of the end of a month. The permittee shall total CO emissions as calculated for the combustion sources and the production sources to determine compliance with the facility-wide CO limit. Records shall be maintained on site for a period of at least five years and shall be made available to DEQ representatives upon request.

[IDAPA 58.01.01.322(a), 4/5/00; PTC No. P-2017.0031, 1/18/2019]

Reporting Requirements

4.4 Reporting Requirement

Once per year, the permittee shall report to DEQ the 12-month total facility-wide CO emissions recorded under CO Limit Compliance Permit Condition to determine compliance with the Facility-Wide CO Limit Permit Condition. The report shall include, but is not limited to, all methods, equations, emissions factors, and sources for emissions factors not previously identified used to determine the 12-month total facility-wide CO emissions. Records of the quantity of fuel consumption used for determining the 12-month total facility-wide CO emissions shall be submitted with the annual report. In addition, the permittee shall provide DEQ with the 12-month rolling emissions totals generated under CO Limit Compliance Permit Condition for the reporting period. The 12-month total facility-wide CO emissions report shall be included in the annual compliance certification submission required by permit condition 13.22.

Any changes in the List of Emissions Units (Table 2.1) not identified in the previous annual report shall be identified and explained. The report shall be for the period January 1st through December 31st and shall be due on or before January 30th of each calendar year. All reports must be certified in accordance with IDAPA 58.01.01.123. The report shall be sent to DEQ at the following address:

Air Quality Stationary Source Division
Idaho Department of Environmental Quality
1410 N. Hilton
Boise, ID 83706-1255
Telephone: (208) 373-0502
Fax: (208) 373-0340

[IDAPA 58.01.01.322(a), 4/5/2000; PTC No. P-2017.0031, 1/18/2019]

5 Boiler 2A and Boiler 3

Summary Description

Boilers located at this facility include Boiler 2A which is a 91.5 MMBtu/hr, natural gas-fired boiler and Boiler 3 which is a 39MMBtu/hr dual fired natural gas/low sulfur distillate oil boiler. The boilers supply steam to the production lines at BAF.

Table 5.1 describes the devices used to control emissions from Boiler 2A and Boiler 3.

Table 5.1 Boiler 2A and Boiler 3 Description

Emissions Units / Processes	Control Devices
Boiler 2A	Low NOx Boiler
Boiler 3	None

Table 5.2 contains only a summary of the requirements that apply to the Boiler 2A and Boiler 3. Specific permit requirements are listed below.

Table 5.2 Applicable Requirements Summary [a]

Permit Conditions	Parameter	Limit/Standard Summary	Applicable Requirements Reference	Operating, Monitoring, and Recordkeeping Requirements
5.1, 5.2, 5.3	PM_{10}, SO_2, NO_x, and CO Emissions	Various	IDAPA 58.01.01.322.01 P-2017.0031	5.6, 5.7-5.8, 5.9-5.11, 5.13-5.14
5.4, 5.5	Fuel Restrictions	Boiler 2A: NG only Boiler 3: NG 328 MMscf per year Oil 393,120 gallons per year	40 CFR 60 Dc 40 CFR 63 JJJJJJ (if Oil is used) IDAPA 58.01.01.727-728 P-2017.0031	5.12, 5.15-5.17

a) The table is for reference only. Specific requirements are set forth in individual permit conditions below.

Emission Limits

5.1 Emissions Limits

The emissions from the Boiler 2A and Boiler 3 stack shall not exceed any corresponding emissions rate limits listed in Table 5.3.

Table 5.3 Boiler 2A and Boiler 3 Emission Limits [a]

Source Description	$PM_{2.5}/PM_{10}$ [b]		SO_2		NO_X		CO	
	lb/hr [c]	T/yr [d]	lb/hr [c]	T/yr [d]	lb/hr [c]	T/yr [d]	lb/hr [c]	T/yr [d]
Boiler 2A	0.68	2.99	0.05	0.24	3.34	14.61	6.77	29.64
Boiler 3	0.30	1.53	1.90	1.75	5.40	17.93	1.80	2.16

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.

[PTC No. P-2017.0011, 4/16/2021]

5.2 Emissions limit for Fuel-Burning Equipment

The permittee shall not discharge to the atmosphere from any boiler PM in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas fuel and 0.050 gr/dscf of effluent gas corrected to 3% oxygen by volume for liquid fuel in accordance with IDAPA 58.01.01.676-677.

[IDAPA 58.01.01.676-677, 5/1/1994; PTC No. P-2017.0011, 4/16/2021]

5.3 Opacity Limit

Emissions from the boiler stacks, or any other stack, vent, or functionally equivalent opening associated with the boiler, shall be evaluated for visual emissions as described in Permit Condition 3.7.

[IDAPA 58.01.01.625, 5/8/2009; PTC No. P-2017.0011, 4/16/2021]

Operating Requirements

5.4 Allowable Fuels and Fuel Sulfur Content - Boilers 2A and 3

- Boiler 2A shall burn natural gas only.
- Boiler 3 may burn natural gas fuel as primary fuel and low sulfur distillate oil as secondary fuel. Distillate oil burned in Boiler 3 shall not exceed 0.05% sulfur by weight.

[IDAPA 58.01.01.725, 5/1/1994; PTC No. P-2017.0011, 4/16/2021]

5.5 Fuel Usage Limits - Boiler 3

- The quantity of natural gas combusted in Boiler 3 shall not exceed 328 million standard cubic feet (MMscf) per year, based on any consecutive 12-month period.
- The quantity of distillate oil combusted in Boiler 3 shall not exceed 393,120 gallons per year, based on any consecutive 12-month period.

[PTC No. P-2017.0011, 4/16/2021]

5.6 Annual Boiler Tune-up - Boiler 3

The burners in Boiler 3 shall be tuned annually to maintain efficient fuel combustion.

[PTC No. P-2017.0011, 4/16/2021]

5.7 Boilers 1 and 2 Operation Status

Boilers 1 and 2 shall be inoperable. Fuel supply lines to Boilers 1 and 2 shall be removed.

[PTC No. P-2017.0011, 4/16/2021]

5.8 Boiler 2A Stack

The emissions from Boiler 2A shall exhaust through the existing 100-foot tall stack that was designed to serve Boilers 1 and 2 when either boiler burned fuel oil.

[PTC No. P-2017.0011, 4/16/2021]

5.9 40 CFR 63 Subpart JJJJJJ Liquid Fuel Requirements for Boiler 3

- In accordance with the definition of a gas-fired boiler in 40 CFR 63.11237, while operating as a gas boiler, Boiler 3 may fire distillate fuel only during periods of gas curtailment, gas supply interruption, startups, or periodic testing on liquid fuel. Periodic testing of liquid fuel shall not exceed a combined total of 48 hours during any calendar year.

- If BAF elects to operate Boiler 3 with distillate fuel oil full-time, BAF's Tier I operating permit shall be modified to include applicable provisions of 40 CFR 63.

[40 CFR 63.11237; IDAPA 58.01.01.322, 4/6/2005]

Monitoring and Recordkeeping Requirements

5.10 Records of Boiler Tuning – Boiler 3

Records shall be maintained of the boiler tuning providing the date the tuning was conducted and a description of adjustments made to the burners to improve combustion efficiency.

[PTC No. P-2017.0011, 4/16/2021]

5.11 Monitoring of Boiler Operating Parameters – Boiler 3

The following operating data shall be monitored and recorded:

5.11.1 On a monthly basis, record the quantity of natural gas combusted in Boiler 3 in units of MMscf per month and MMscf per consecutive 12-month period. The annual fuel consumption shall be determined by summing the most recent monthly quantity and the monthly quantities over the previous consecutive 11months period.

5.11.2 On a monthly basis, record the quantity of distillate oil combusted in Boiler 3 in units of gallons per month and gallons per consecutive 12-month period.

[PTC No. P-2017.0011, 4/16/2021]

5.12 Fuel Sulfur Content Receipts - Boiler 3

For each shipment of fuel oil received, the permittee shall obtain and maintain at the facility fuel receipts from the fuel supplier which demonstrate the oil received complies with the fuel sulfur content limits specified in Permit Condition 5.4.

[PTC No. P-2017.0011, 4/16/2021]

5.13 Recordkeeping Requirement

The permittee shall maintain documentation showing that Boiler 2A uses low NOx burner and has manufacturer's guarantee of 30 ppmvd for NOx and 100 ppmvd for CO at 3% O_2.

[PTC No. P-2017.0011, 4/16/2021]

Performance Testing Requirements

5.14 Initial Performance Test for NOx and CO

5.14.1 Within 180 days after startup of Boiler 2A, the permittee shall conduct an initial performance test to demonstrate compliance with the NOx and CO emission limits in Permit Condition 5.1 to verify and confirm the manufacturer's emissions concentration guarantees. The permittee is encouraged to submit a source testing protocol for approval 30 days prior to conducting the performance test.

5.14.2 The permittee shall test in accordance with the requirements of IDAPA 58.01.01.157.02(a) which require that testing must be conducted under operational conditions specified in the applicable state or federal regulation, rule, permit, order, consent decree or by Department approval. If the operational requirements are not specified, the source should test at worst-case normal operating conditions. Worst-case normal conditions are those conditions of fuel type, and moisture, process material makeup and moisture and process procedures which are changeable or which could reasonably be expected to be encountered during the operation of the facility and which would result in the highest pollutant emissions from the facility. A description of how the process operating conditions achieved during testing satisfy these requirements shall be included in the final test report.

In addition, the permittee shall test in accordance with other requirements in IDAPA 58.01.01.157 and General Provisions of this permit which contain notification, testing procedures and reporting requirements for testing.

5.14.3 The permittee shall monitor and record the following parameters during each performance test:

- The steaming rate in lb/hr
- Natural gas usage in MMscf/hr

5.14.4 The test report shall contain Boiler 2A heat input rate calculations.

[IDAPA 58.01.01.157, 4/5/2000; PTC No. P-2017.0011, 4/16/2021]

40 CFR 60 Subpart Dc—Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (This only applies to Boiler 2A)

5.15 NSPS 40 CFR 60, Subpart Dc - §60.40c Applicability

Boiler 2A is subject to 40 CFR 60 Subpart Dc because it is a steam generating unit for which construction commenced after June 9, 1989 with a maximum design heat input capacity of 100 MMBtu/hr or less, but greater than or equal to 10 MMBtu/hr.

[40 CFR 60.40c; PTC No. P-2017.0011, 4/16/2021]

5.16 NSPS 40 CFR 60, Subpart Dc - §60.48c Reporting and recordkeeping requirements.

In accordance with 40 CFR60.48c(a), the permittee shall submit notification of the date of construction or reconstruction and actual startup, as provided by 40 CFR 60.7. This notification shall include:

- The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility, in accordance with 40 CFR60.48c(a)(1).
- The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired, in accordance with 40 CFR60.48c(a)(3).

[40 CFR 60.48c(a); PTC No. P-2017.0011, 4/16/2021]

5.17 NSPS 40 CFR 60, Subpart Dc - §60.48c Reporting and recordkeeping requirements.

In accordance with 40 CFR 60.48c(g), the permittee shall record and maintain records of the amount of fuel combusted during each calendar month.

[40 CFR 60.48c(g); PTC No. P-2017.0011, 4/16/2021]

6 Process A

Summary Description

The following is a narrative description of Process A regulated in this permit. This description is for informational purposes only.

Process A produces dehydrated potato products. The raw materials put into the process are cooked potatoes and food additives, including sulfites. Process A can operate up to 8,760 hr/yr. There are no alternate operating scenarios.

Emissions units included in Process A include process vents from process equipment. All emissions units associated with this process are potential sources of particulate matter. However, only sources from Process A that require a PTC are regulated under this permit. The drying unit processes can potentially emit SO2 from the decomposition of sulfites. Drying heat is provided by both natural gas combustion and steam produced by the plant's boilers.

This process was constructed in the early 1960s.

Table 6.1 describes the devices used to control emissions from Process A.

Table 6.1 Process A Description

Emissions Units / Processes	Control Devices
DHQ-cooler	None
DHT-dryer (7 MMBtu/hr natural gas-fired)	
DHU-dryer (7 MMBtu/hr natural gas-fired)	
DHZ-dryer (6 MMBtu/hr steam and natural gas-fired)	

Table 5.2 contains only a summary of the requirements that apply to Process A. Specific permit requirements are listed below.

Table 6.2 Applicable Requirements Summary [(a)]

Permit Conditions	Parameter	Limit/Standard Summary	Applicable Requirements Reference	Operating, Monitoring, and Recordkeeping Requirements
6.1	PM, SO_2, NO_x, CO Emissions	Various	PTC No. P-2009.0043, 7/27/2017; IDAPA 58.01.01.322.01;	3.7-3.9, 6.4-6.7
6.2	PM	Process Weight	PTC No. P-2009.0043, 7/27/2017; IDAPA 58.01.01.702	3.7-3.9, 6.2.1
6.3	Visible Emissions	20% opacity for no more than three minutes in any 60-minute period	PTC No. P-2009.0043, 7/27/2017; IDAPA 58.01.01.625	3.7-3.9, 6.3

a) The table is for reference only. Specific requirements are set forth in individual permit conditions below.

Emission Limits

6.1 Emissions Limits

The emissions from the Process A stacks shall not exceed any corresponding emissions rate limits listed in Table 6.3.

Table 6.3 Process A Emission Limits [a]

Source Description	$PM_{2.5}/PM_{10}$ [b]		SO_2		NO_X		CO	
	lb/day [c]	T/yr [d]	lb/hr [c]	T/yr [d]	lb/hr [c]	T/yr [d]	lb/hr [c]	T/yr [d]
DHQ cooler	10.82	1.38						
DHT dryer	39.60	5.06	0.09	0.30	0.54	2.36	2.80	12.26
DHU dryer	39.60	5.06	0.09	0.30	0.54	2.36	2.80	12.26
DHZ dryer	59.76	7.63	0.16	0.52	0.31	1.34	1.56	6.83

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.

[IDAPA 58.01.01.322.01, 3/19/1999; PTC No. P-2009.0043, 7/27/2018]

6.2 PM Limit

The permittee shall not discharge to the atmosphere from any source operating prior to October 1, 1979, PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour.

a. If PW is less than 17,000 lb/hr,

$$E = 0.045(PW)^{0.6}$$

b. If PW is equal to or greater than 17,000 lb/hr,

$$E = 1.\ 12(PW)^{0.27}$$

[IDAPA 58.01.01.702, 4/5/2000; PTC No. P-2009.0043, 7/27/2018]

6.2.1 The process weight PM limitation applies to the collection of emissions units/processes identified in Table 6.3. Demonstrating compliance with the visible emissions requirement contained in Permit Condition 6.3 inherently demonstrates compliance with the process weight PM emissions limitations.

[IDAPA 58.01.01.322.01, 3/19/1999; PTC No. P-2009.0043, 7/27/2018]

6.3 Opacity Limit

Emissions from the Process A stacks, or any other stack, vent, or functionally equivalent opening associated with the Process A, 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.

[IDAPA 58.01.01.625, 5/8/2009; PTC No. P-2009.0043, 7/27/2018]

Operating Requirements

6.4 Dryer Fuels

Each dryer shall combust only natural gas or be heated by steam from the plant boilers.

[PTC No. P-2009.0043, 7/27/2018]

6.5 Process Identification

Each emission unit listed in Table 6.1 shall be identified by signs posted on or near each cooler or dryer. The signage shall identify the emission unit as listed in the Table 6.3, and shall indicate the equipment is part of Process A.

[PTC No. P-2009.0043, 7/27/2018]

Monitoring and Recordkeeping Requirements

6.6 Dried Food Products Throughput Monitoring

The permittee shall monitor and record on a daily basis, the calendar date and the product throughput of dried food products, including additives, (known as "Production from New Inputs"), in pounds per day, from each Process A emission unit when in operation. Records shall be maintained on site for the most recent five-year period and shall be made available to DEQ representatives upon request.

[PTC No. P-2009.0043, 7/27/2018]

6.7 $PM_{2.5}$ and PM_{10} Compliance Demonstration

6.7.1 In order to demonstrate compliance with the daily and yearly PM_{10} and $PM_{2.5}$ emission limits contained in Table 6.3, the permittee shall calculate PM_{10} and $PM_{2.5}$ emissions by multiplying an approved production based emission factor by the associated throughput, in accordance with the following formula:

$E_i = EF_i * P_i$

Where:

E_i = emissions, lb from stack i for the calculation period
EF_i = emission factor for stack i, lb pollutant/1000 lb finished product
P = thousands of pounds of throughput for the calculation period

6.7.2 Compliance with the annual limits shall be based on a rolling 12-month average. Each month shall be a calendar month.

6.7.3 Compliance with the daily limits shall be based on pounds per daily production period. Daily production records may be maintained on a work-day basis, in which a work day commences at a specific time of day and lasts for 24 consecutive hours.

6.7.4 Emission factors for each stack shall be determined from the most recent performance test for each stack or as otherwise approved by DEQ.

6.7.5 PM_{10} and $PM_{2.5}$ emission records and calculations shall be maintained on site for the most recent five-year period and shall be made available to DEQ representatives upon request.

[IDAPA 58.01.01.322.01, 3/19/1999, IDAPA 58.01.01.322.06, 07, 5/1/1994;
PTC No. P-2009.0043, 7/27/2018]

7 Process B

Summary Description

The following is a narrative description of Process B regulated in this permit. This description is for informational purposes only.

Process B produces dehydrated potato products. The raw materials put into the process are cooked potatoes and food additives, including sulfites. Process B can operate up to 8,760 hr/yr. There are no alternate operating scenarios.

Emissions units included in Process B include process vents from process equipment. All emissions units associated with this process are potential sources of particulate matter. However, only sources from Process B that require a PTC are regulated under this permit. The drying unit processes can potentially emit SO_2 from the decomposition of sulfites. Drying heat is provided by both natural gas combustion and steam produced by the plant's boilers.

This process was constructed in the early 1960s.

Table 7.1 describes the devices used to control emissions from Process B.

Table 7.1 Process B Description

Emissions Units / Processes	Control Devices
DUQ - dryer (7 MMBtu/hr natural gas-fired)	None
DUT - dryer (7 MMBtu/hr natural gas-fired)	
DUV - 2 dryers (6 MMBtu/hr each, steam and natural gas-fired)	
DQA - dryer (7 MMBtu/hr natural gas-fired)	
DQB - dryer (7 MMBtu/hr natural gas-fired)	

Table 7.2 contains only a summary of the requirements that apply to Process B. Specific permit requirements are listed below.

Table 7.2 Applicable Requirements Summary [(a)]

Permit Conditions	Parameter	Limit/Standard Summary	Applicable Requirements Reference	Operating, Monitoring, and Recordkeeping Requirements
7.1	$PM_{2.5}/PM_{10}$, SO_2, NO_x, CO	Various	PTC No. P-2009.0043, 7/27/2017 IDAPA 58.01.01.322.01	7.3, 7.5, 7.6
7.2	Visible Emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	3.7-3.9, 7.3

a) The table is for reference only. Specific requirements are set forth in individual permit conditions below.

Emission Limits

7.1 Emissions Limits

The emissions from the Process B stacks shall not exceed any corresponding emissions rate limits listed in Table 7.3.

Table 7.3 Process B Emission Limits [a]

Source Description	$PM_{2.5}/PM_{10}$ [b]		SO_2		NO_X		CO	
	lb/day [c]	T/yr [d]	lb/hr [c]	T/yr [d]	lb/hr [c]	T/yr [d]	lb/hr [c]	T/yr [d]
DUQ stack	39.60	5.06	0.09	0.30	0.54	2.36	2.80	12.26
DUT stack	39.60	5.06	0.09	0.30	0.54	2.36	2.80	12.26
DUV stack	28.02	3.58	0.33	1.05	0.61	2.68	3.12	13.67
DQA stack	39.60	5.06	0.09	0.30	0.54	2.36	2.80	12.26
DQB stack	39.60	5.06	0.09	0.30	0.54	2.36	2.80	12.26

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.

[IDAPA 58.01.01.322.01, 3/19/1999; PTC No. P-2009.0043, 7/27/2018]

7.2 Opacity Limit

Emissions from the Process B stacks, or any other stack, vent, or functionally equivalent opening associated with Process B, 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.

[IDAPA 58.01.01.625, 5/8/2009; PTC No. P-2009.0043, 7/27/2018]

Operating Requirements

7.3 Dryer Fuels

Each dryer shall combust only natural gas or be heated by steam from the plant boilers.

[PTC No. P-2009.0043, 7/27/2018]

7.4 Process Identification

Each emission unit listed in Table 7.1 shall be identified by signs posted on or near each cooler or dryer. The signage shall identify the emission unit as listed in the Table 7.1, and shall indicate the equipment is part of Process B.

[PTC No. P-2009.0043, 7/27/2018]

Monitoring and Recordkeeping Requirements

7.5 Dried Food Products Throughput Monitoring

The permittee shall monitor and record on a daily basis, the calendar date and the product throughput of dried food products, including additives, (known as "Production from New Inputs"), in pounds per day, from each Process B emission unit when in operation. Records shall be maintained on site for the most recent five-year period and shall be made available to DEQ representatives upon request.

[PTC No. P-2009.0043, 7/27/2018]

7.6 $PM_{2.5}$ and PM_{10} Compliance Demonstration

7.6.1 In order to demonstrate compliance with the daily and yearly PM_{10} and $PM_{2.5}$ emission limits contained in Table 7.3 the permittee shall calculate PM_{10} and $PM_{2.5}$ emissions by multiplying an approved production based emission factor by the associated throughput, in accordance with the following formula:

$E_i = EF_i * P_i$

Where:

E_i = emissions, lb from stack i for the calculation period
EF_i = emission factor for stack i, lb pollutant/1000 lb finished product
P = thousands of pounds of throughput for the calculation period

7.6.2 Compliance with the annual limits shall be based on a rolling 12-month average. Each month shall be a calendar month.

7.6.3 Compliance with the daily limits shall be based on pounds per daily production period. Daily production records may be maintained on a work-day basis, in which a work day commences at a specific time of day and lasts for 24 consecutive hours.

7.6.4 Emission factors for each stack shall be determined from the most recent performance test for each stack or as otherwise approved by DEQ.

7.6.5 PM_{10} and $PM_{2.5}$ emission records and calculations shall be maintained on site for the most recent five-year period and shall be made available to DEQ representatives upon request.

[PTC No. P-2009.0043, 7/27/2018]

8 Process C

Summary Description

The following is a narrative description of Process C regulated in this permit. This description is for informational purposes only.

Process C produces dehydrated food products. The raw materials put into the process include raw and cooked foods, previously dehydrated foods, and food additives, including sulfites. Process C can operate up to 8,760 hr/yr. There are no alternate operating scenarios.

Emissions units included in Process C include process vents from process equipment. All emissions units associated with this process are potential sources of particulate matter. However, only sources from Process C that require a PTC are regulated under this permit. The process equipment can potentially emit SO_2 from the decomposition of sulfites. Drying heat is provided by steam produced by the plant's boilers and natural gas-fired heaters

Table 7.1 describes the devices used to control emissions from Process C.

Table 8.1 Process C Description

Emissions Units / Processes	Control Devices
CIR: Dryer – Steam heated	RotoClone (Wet Dust Collector)
CXX/CYY: Dryer –6.05 MMBtu/hr pre-heater, 4.4 MMBtu/hr front dryer, 6.6 MMBtu/hr rear dryer, all natural gas-fired CHX: Dryer – 10.3 MMBtu/hr, steam heated and natural gas-fired, with a 2.9 MMBtu/hr pre-heater, natural gas-fired HEB: Dryer - 6 MMBtu/hr, natural gas-fired CBB: Dryer – 1.5 MMBtu/hr, natural gas-fired CNV: Dryer - 12 MMBtu/hr, natural gas-fired CNW: Dryer - 12 MMBtu/hr, natural gas-fired CTU: Dryer – Steam heated	None
CTZ: Dryer – 5.75 MMBtu/hr, natural gas-fired	Low-NO_X/CO burner

Table 7.2 contains only a summary of the requirements that apply to the Process C. Specific permit requirements are listed below.

Table 8.2 Applicable Requirements Summary [(a)]

Permit Conditions	Parameter	Limit/Standard Summary	Applicable Requirements Reference	Operating, Monitoring, and Recordkeeping Requirements
8.1	$PM_{2.5}/PM_{10}$, SO_2, NO_x, CO	Various	PTC No. P-2009.0043, 7/27/2017 IDAPA 58.01.01.322.01	8.3, 8.5, 8.6, 8.7
8.2	Visible Emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	3.7-3.9, 7.3

a) The table is for reference only. Specific requirements are set forth in individual permit conditions below.

Emission Limits

8.1 Emissions Limits

The emissions from the Process C stack shall not exceed any corresponding emissions rate limits listed in Table 8.3.

Table 8.3 Process C Emission Limits [a]

Source Description	$PM_{2.5}/PM_{10}$ [b]		SO_2		NO_X		CO	
	lb/day [c]	T/yr [d]	lb/hr [c]	T/yr [d]	lb/hr [c]	T/yr [d]	lb/hr [c]	T/yr [d]
CIR stack	12.24	1.72	1.21	4.10				
CXX stack	56.64	7.51	0.42	1.38	0.58	2.55	2.73	11.95
CYY stack	54.00	7.16	0.44	1.42	0.35	1.54	2.35	10.30
CHX stack	14.64	1.49	0.08	0.23	0.61	2.66	1.42	6.23
HEB stack	51.12	6.17	0.37	1.10	0.29	1.27	0.46	2.03
CBB stack	6.00	0.79	0.11	0.36	0.08	0.34	0.39	1.71
CNV stack	6.72	0.58	0.07	0.21	0.61	2.68	3.12	13.67
CNW stack	6.72	0.59	0.07	0.21	0.61	2.68	3.12	13.67
CTU stack	45.36	3.96	0.25	0.52				
CTZ stack	11.52	1.00	0.14	0.36	0.13	0.55	0.15	0.67

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.
e) Pounds per daily 24-hour production period.

[IDAPA 58.01.01.322.01, 3/19/1999; PTC No. P-2009.0043, 7/27/2018]

8.2 Opacity Limit

Emissions from the Process C stack, or any other stack, vent, or functionally equivalent opening associated with Process C, 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.

[IDAPA 58.01.01.625, 5/8/2009; PTC No. P-2009.0043, 7/27/2018]

Operating Requirements

8.3 Dryer Fuels

Each dryer shall combust only natural gas or be heated by steam from the plant boilers.

[PTC No. P-2009.0043, 7/27/2018]

8.4 Process Identification

Each emission unit listed in Table 5.1 shall be identified by signs posted on or near each dryer. The signage shall identify the emission unit as listed in Table 5.1, and shall indicate the equipment is part of Process C.

[PTC No. P-2009.0043, 7/27/2018]

8.5 Control Device Requirements

The Permittee shall use and maintain an AAF International, RotoClone W (Wet Dust Collector) on Emission Source CIR in accordance with manufacture's written instructions.

[PTC No. P-2009.0043, 7/27/2018]

Monitoring and Recordkeeping Requirements

8.6 Dried Food Products Throughput Monitoring

The permittee shall monitor and record on a daily basis, the calendar date and the product throughput of dried food products, including additives, (known as "Production from New Inputs"), in pounds per day, from each Process C emission unit when in operation. Records shall be maintained on site for the most recent five-year period and shall be made available to DEQ representatives upon request.

[PTC No. P-2009.0043, 7/27/2018]

8.7 $PM_{2.5}$ and PM_{10} Compliance Demonstration

8.7.1 In order to demonstrate compliance with the daily and yearly PM_{10} and $PM_{2.5}$ emission limits contained in Table 8.3 the permittee shall calculate PM_{10} and $PM_{2.5}$ emissions by multiplying an approved production based emission factor by the associated throughput, in accordance with the following formula:

$E_i = EF_i * P_i$

Where:
E_i = emissions, lb from stack I for the calculation period
EF_i = emission factor for stack I, lb pollutant/1000 lb finished product
P = thousands of pounds of throughput for the calculation period

8.7.2 Compliance with the annual limits shall be based on a rolling 12-month average. Each month shall be a calendar month.

8.7.3 Compliance with the daily limits shall be based on pounds per daily production period. Daily production records may be maintained on a work-day basis, in which a work day commences at a specific time of day and lasts for 24 consecutive hours.

8.7.4 Emission factors for each stack shall be determined from the most recent performance test for each stack or as otherwise approved by DEQ.

8.7.5 PM_{10} and $PM_{2.5}$ emission records and calculations shall be maintained on site for the most recent five-year period and shall be made available to DEQ representatives upon request.

[PTC No. P-2009.0043, 7/27/2018]

9 Production Line C-8

Summary Description

Production line C-8 prepares dried vegetable product from a combination of fresh vegetables and previously dried vegetables. The production line includes a two-stage pre-dryer and a dryer, operating in series. The pre-dryer and dryer are natural gas fired. The maximum production rate is 70,000 pounds of finished product per day, and the permitted annual production rate is 21.7 million pounds of finished product per year.

A 5 MMBtu/hr natural gas fired air make-up unit provides comfort heating in the area where the production line C-8 is located. Room air is used as intake air for the pre-dryer and dryer; thus, the combustion products from the direct heat transfer air make-up unit exhaust through the pre-dryer and dryer stacks. Emissions from the air make-up unit are prorated to individual stacks based on the stack air flow rates.

A MicroMist® Venturi scrubber is installed to reduce particulate emissions from the dryer. Particulate emissions from the pre-dryer will be uncontrolled.

Low-NOx burners are used for the pre-dryer, dryer, and the air make-up unit. The burners for the air make-up unit and the first-stage pre-dryer limit NOx to 25 ppmvd @ 3% O_2. The burner for the second-stage pre-dryer limits NOx to 20 ppmvd @ 3% O_2, and the burner for the dryer limits NOx to 10 ppmvd @ 3% O_2.

Table 9.1 describes the devices used to control emissions from Production Line C-8.

Table 9.1 Production Line C-8 Description

Emissions Units / Processes	Control Devices
Pre-dryer First stage burner model: 25 ppmvd @ 3% O_2 Heat input rating: 6.0 MMBtu/hr Second stage burner model: 20 ppmvd @ 3% O_2 Heat input rating: 2.0 MMBtu/hr Fuel: natural gas	Low NOx burner
Dryer Burner model: 10 ppmvd @ 3% O_2 Heat input rating: 5.0 MMBtu/hr Fuel: natural gas	Low NOx burner Wet Venturi Scrubber $PM_{10}/PM_{2.5}$ control efficiency: 75.0%
Air Makeup Unit Burner Model: Low NOx burner, 25 ppmvd @ 3% O_2 Heat input rating: 5.0 MMBtu/hr Fuel: natural gas	Low NOx burner

Table 9.2 contains only a summary of the requirements that apply to the Production Line C-8. Specific permit requirements are listed below.

Table 9.2 Applicable Requirements Summary [a]

Permit Conditions	Parameter	Limit/Standard Summary	Applicable Requirements Reference	Operating, Monitoring, and Recordkeeping Requirements
9.1	$PM_{2.5}/PM_{10}$, SO_2, NO_x, CO	Various	PTC No. P-2017.0011, 4/16/2021 IDAPA 58.01.01.322.01	9.3-9.7, 9.8-9.11, 9.12-9.17
9.2	Visible Emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	3.7-3.9

a) The table is for reference only. Specific requirements are set forth in individual permit conditions below.

Emission Limits

9.1 Emissions Limits

The emissions from the Production Line C-8 stack shall not exceed any corresponding emissions rate limits listed in Table 9.3.

Table 9.3 Production Line C-8 Emission Limits [a]

Source Description	$PM_{2.5}/PM_{10}$ [b]		PM_{10} [b]	SO_2		NO_X		CO
	lb/day [c]	T/yr [d]	lb/day	lb/hr [c]	T/yr [d]	lb/hr [c]	T/yr [d]	lb/hr [c]
Pre-dryer stack (NND stack) [e]	8.10	1.26	11.48	0.013	0.058	0.289	1.14	1.48
Dryer stack (NNG stack [e]	3.10	0.57	3.91	0.022	0.094	0.155	0.47	

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 of 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.
e) Includes the emissions from the 5 MMBtu/hr air make-up.

[IDAPA 58.01.01.322, 4/5/2000; PTC No. P-2017.0011, 4/16/2021]

9.2 Opacity Limit

Emissions from the Production Line C-8 stacks, or any other stack, vent, or functionally equivalent opening associated with the Production Line C-8, 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.

[IDAPA 58.01.01.625, 5/8/2009; PTC No. P-2017.0011, 4/16/2021]

Operating Requirements

9.3 Allowable Maximum Steam Usage

The steam used for the new production line shall not exceed 920 lb/hr.

[IDAPA 58.01.01.314(04)(d), 4/5/2000; PTC No. P-2017.0011, 4/16/2021]

9.4 Allowable Fuel Types

The pre-dryer, dryer, and air makeup unit shall burn natural gas exclusively.

[IDAPA 58.01.01.314(04)(d), 4/5/2000; PTC No. P-2017.0011, 4/16/2021]

9.5 Finished Product Production Rate Limit

The finished product (i.e., dried vegetable product) shall not exceed 70,000 lb/day and 21.7 million pounds per year, based on any consecutive 12- calendar month period.

[IDAPA 58..01.01.200-228, 3/25/2016; IDAPA 58.01.01.314(04)(d), 4/5/2000; PTC No. P-2017.0011, 4/16/2021]

9.6 Low NOx Burner Requirements

The permittee shall use low NOx burners for the following emissions units. The NOx emissions shall not exceed the NOx concentration as specified in the following:

- Air makeup unit burner – 25 ppmvd @ 3% O_2
- First stage burner of the pre-dryer – 25 ppmvd @ 3% O_2
- Second stage burner of the pre-dryer - 20 ppmvd @ 3% O_2
- Dryer burner - 10 ppmvd @ 3% O_2

[IDAPA 58.01.01.314(04)(e), 4/5/2000; PTC No. P-2017.0011, 4/16/2021]

9.7 Venturi Scrubber Operating Requirement

9.7.1 The permittee shall install and operate a Venturi scrubber to control emissions from the dryer.

9.7.2 The scrubber's operating parameters shall be maintained as follows:

- The pressure drop across the throat at MicroMist Venturi stage of the scrubber shall be equal to or greater than the pressure drop obtained during the most recent performance test demonstrating compliance with the emissions limits. At the time of this permit issuance, the pressure drop obtained during the most recent performance test demonstrating compliance with the emissions limits was 17.5 inches of water (tested on 5/30/2019).
- Scrubbing liquid recirculation rate shall be equal to or greater than the recirculation rate obtained during the most recent performance test demonstrating compliance with the emissions limits. At the time of this permit issuance, the recirculation rate obtained during the most recent performance test demonstrating compliance with the emissions limits was 265 gallons per minute (tested on 5/30/2019).

9.7.3 The permittee shall operate the following monitoring devices:

- A device to continuously measure the pressure drop across the throat at MicroMist Venturi stage of the scrubber in inches of water.
- A device to continuously measure the scrubbing liquid recirculation rate (inlet) to the Venturi scrubber in gallons per minute.

[IDAPA 58.01.01.314(04)(e), 4/5/2000; PTC No. P-2017.0011, 4/16/2021]

Monitoring and Recordkeeping Requirements

9.8 Allowable Maximum Steam Monitoring

To demonstrate compliance with the Allowable Maximum Steam Limit of the permit, the permittee shall monitor and record the steam usage for the new production line hourly.

[IDAPA 58.01.01.322, 4/5/2000; PTC No. P-2017.0011, 4/16/2021]

9.9 $PM_{2.5}$ and PM_{10} Compliance Demonstration

9.9.1 The permittee shall monitor and record the daily finished product produced from production line C-8 to demonstrate compliance with Finished Product Production Rate Limit Permit Condition (i.e., Permit Condition 9.5).

9.9.2 Daily production records may be maintained on a work-day basis, in which a work day commences at a specific time of day.

9.9.3 Every calendar month, the permittee shall record the monthly and annual finished product produced from production line C-8 to demonstrate compliance with the annual finished product limit in Permit Condition 9.5. The annual finished product shall be calculated by summing the monthly finished product from the previous consecutive 12-month period**.**

[IDAPA 58.01.01.322, 4/5/2000; PTC No. P-2017.0011, 4/16/2021]

9.10 Low NOx Burner Requirements Recordkeeping

The permittee shall maintain documentation showing that the burners of the air makeup unit, pre-dryer, and dryer meet Low NOx Burner Requirements of the permit. Manufacturer or vendor technical specifications for installed equipment are acceptable documentation.

[IDAPA 58.01.01.322, 4/5/2000; PTC No. P-2017.0011, 4/16/2021]

9.11 Venturi Scrubber Operating Requirements Monitoring

The permittee shall monitor and record the following parameters:

- The pressure drop across the throat at MicroMist Venturi stage of the scrubber in inches of water once per operating shift.
- The scrubbing liquid recirculation rate in gallons per minute weekly.

[IDAPA 58.01.01.322, 4/5/2000; PTC No. P-2017.0011, 4/16/2021]

Performance Testing Requirements

9.12 Performance Test for $PM_{2.5}$

If additional source testing is performed, the permittee shall conduct a performance test on the pre-dryer and dryer approximately the same time, such as in two consecutive days to demonstrate compliance with the $PM_{2.5}$ emission limits in Emissions Limits permit condition (i.e., Permit Condition 9.1).

9.12.1 The permittee is encouraged to submit a source testing protocol for approval 30 days prior to conducting the performance test.

9.12.2 The permittee shall test in accordance with the requirements of IDAPA 58.01.01.157.02(a) which require that testing must be conducted under operational conditions specified in the applicable state or federal regulation, rule, permit, order, consent decree or by Department approval. If the operational requirements are not specified, the source should test at worst-case normal operating conditions. Worst-case normal conditions are those conditions of fuel type, and moisture, process material makeup and moisture and process procedures which are changeable or which could reasonably be expected to be encountered during the operation of the facility and which would result in the highest pollutant emissions from the facility. A description of how the process operating conditions achieved during testing satisfy these requirements shall be included in the final test report.

In addition, the permittee shall test in accordance with other requirements in IDAPA 58.01.01.157 and General Provisions of this permit which contain notification, testing procedures and reporting requirements for testing.

9.12.3 The permittee shall monitor and record the following parameters during each performance test:

For testing the pre-dryer:

- The steam usage in lb a minimum of once every 15 minutes.
- The finished product in lb a minimum of once every 15 minutes.

For testing the dryer:

- The steam usage in lb a minimum of once every 15 minutes.
- The finished product in lb a minimum of once every 15 minutes.
- The pressure drop across the throat at MicroMist venture stage of the scrubber in inches of water a minimum of once every 15 minutes.
- The scrubbing liquid recirculation rate in gallons per minute a minimum of once every 15 minutes.

9.12.4 The test report shall include a calculation of the average scrubbing liquid recirculation rate and the pressure drop across the throat at MicroMist Venturi stage during the stack test.

9.12.5 All calculations using operating data during the test shall use 15-minute block averages, with averaging conducted for the duration of a given sample run.

[IDAPA 58.01.01.322, 4/5/2000; PTC No. P-2017.0011, 4/16/2021]

10 Plant Space Heaters (Air Makeup Units)

Summary Description

The BAF Blackfoot Facility has natural gas-fired space heaters/air make up units ranging in size from less than 200,000 Btu/hr to 13.5 MMBtu/hr. At the time of permit issuance, total space heater combustion capacity is 82.6 MMBtu/hr. Most of the units provide direct heating; i.e., the combustion air from the unit is discharged directly into the facility to provide heating (See Appendix A for heat rating of all plant space heaters (air makeup units).

Table 10.1 describes the devices used to control emissions from Plant Space Heaters.

Table 10.1 Plant Space Heaters Description

Emissions Units / Processes	Control Devices
Plant Space Heaters (combined) - 77.6 MMBtu/hr, natural gas-fired	None

Table 10.2 contains only a summary of the requirements that apply to the Plant Space Heaters. Specific permit requirements are listed below.

Table 10.2 Applicable Requirements Summary [(a)]

Permit Conditions	Parameter	Limit/Standard Summary	Applicable Requirements Reference	Operating, Monitoring, and Recordkeeping Requirements
10.1	PM	Process Weight	PTC P-2009.0043, 7/27/18 IDAPA 58.01.01.322.01	10.2

a) The table is for reference only. Specific requirements are set forth in individual permit conditions below.

Emission Limits

10.1 Emissions Limits

The emissions from the Plant Space Heaters stack shall not exceed any corresponding emissions rate limits listed in Table 10.3.

Table 10.3 Plant Space Heaters Emission Limits[(a)]

Source Description	$PM_{10}/PM_{2.5}$ [(b)]	
	lb/day[(c)]	T/yr [(d)]
Plant Space Heaters (AMUs)[(e)] (combined)	13.92	1.27

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 ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.
c) Pounds per daily 24-hour production period.
d) Tons per any consecutive 12-calendar month period.
e) Emission limits for use of plant space heaters (air makeup units) is for a combined total from all gas fired space heaters.

[IDAPA 58.01.01.322, 4/5/2000; PTC No. P-2009.0043, 7/27/2018]

Monitoring and Recordkeeping Requirements

10.2 PM_{10} and $PM_{2.5}$ Compliance Demonstration

In order demonstrate compliance with $PM_{10}/PM_{2.5}$ 1.27 T/yr emission limit in permit condition 10.1 the permittee shall determine the total natural gas usage of the plant space heaters (air makeup units) on a monthly basis. The annual limit shall be based on a rolling 12-month average where each month shall be a calendar month. Natural gas combustion in the plant space heaters (air makeup units) will be calculated as the difference between the total facility natural gas usage less natural gas usage combusted from Process A, B, and C as well as facility boilers and Production Line C-8 (see permits P-2017.0031 and P-2017.0011, respectively). Emissions calculations shall use only DEQ approved emission factors or methods. Records shall be maintained on site for the most recent five-year period and shall be made available to DEQ representatives upon request.

[IDAPA 58.01.01.322, 4/5/2000; PTC No. P-2009.0043, 7/27/2018]

11 Emergency Engine

Summary Description

The BAF Blackfoot Facility has an emergency propane-fired reciprocating internal combustion engine (RICE).

Table 11.1 describes the devices used to control emissions from the emergency propane-fired RICE.

Table 11.1 Emergency Engine Description

Emissions Units / Processes	Control Devices
Emergency Engine (RICE) Manufacturer: International Harvester Model: UV-549 Serial Number: 10225 Construction Date: 1962 Fuel: Propane Cylinders: 8 Horsepower: 201 net HP at 2800 rpm full load Displacement: 49 cubic inches	None

Table 11.2 contains only a summary of the requirements that apply to the emergency RICE. Specific permit requirements are listed below.

Table 11.2 Applicable Requirements Summary (a)

Permit Conditions	Parameter	Limit/Standard Summary	Applicable Requirements Reference	Operating, Monitoring, and Recordkeeping Requirements
None	Comply with 40 CFR 63 Subpart ZZZZ	None	40 CFR 63 Subpart ZZZZ	11.3-11.13

a The table is for reference only. Specific requirements are set forth in individual permit conditions below.

Operating Requirements

11.1 40 CFR 63 Subpart ZZZZ Maintenance Requirements

In accordance with 40 CFR 63 Subpart ZZZZ Table 2d, no later than October 19, 2013, except during periods of start-up, the permittee shall:

11.1.1 Change oil and filter every 500 hours of operation or annually, whichever comes first;

11.1.2 Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first;

11.1.3 Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary; and

11.1.4 In accordance with 6625(j), an oil analysis program is available in order to extend the specified oil change requirement.

[40 CFR 63 Subpart ZZZZ Table 2d]

11.2 40 CFR 63 Subpart ZZZZ General Operation and Maintenance Requirements

In accordance with 40 CFR 63.6605(b), at all times, the permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing

emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

[40 CFR 63.6605(b)]

11.3 40 CFR 63 Subpart ZZZZ Additional Operation and Maintenance Requirements

In accordance with 40 CFR 63.6625(e), the permittee must operate and maintain the stationary RICE according to the manufacturer's emission-related written instructions or facility-developed maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

[40 CFR 63.6625(e)]

11.4 40 CFR 63 Subpart ZZZZ Idle at Startup

In accordance with 40 CFR 63.6625(h), the permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in 40 CFR 63 Subpart ZZZZ Tables 1a, 2a, 2c, and 2d apply.

[40 CFR 63.6625(h)]

11.5 40 CFR 63 Subpart ZZZZ Emergency Operation Requirements

To remain classified as an emergency stationary RICE, and in accordance with 40 CFR 63.6640(f):

11.5.1 There is no time limit on the use of emergency stationary RICE in emergency situations.

11.5.2 The permittee may operate the emergency stationary RICE for any combination of the purposes specified below for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed in this permit condition counts as part of the 100 hours per calendar year allowed by this permit condition.

- Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the EPA Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.
- Emergency stationary RICE may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.

11.5.3 Emergency stationary RICE located at area sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in this Emergency Operation Requirements permit condition. Except as provided in paragraphs (f)(4)(i) and (ii) of 40 CFR 63.6640, the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

[40 CFR 63.6640]

Monitoring and Recordkeeping Requirements

11.6 40 CFR 63 Subpart ZZZZ Continuous Compliance Demonstration

In accordance with 40 CFR 63.6640 and Table 6, the permittee shall demonstrate continuous compliance by:

11.6.1 Operating and maintaining the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or

11.6.2 Developing and following a maintenance plan designed by the permittee which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

[40 CFR 63 Subpart ZZZZ Table 6]

11.7 40 CFR 63 Subpart ZZZZ Maintenance Records

The facility must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the facility operated and maintained the stationary RICE and after-treatment control device (if any) according to the maintenance plan.

[40 CFR 63.6655(e)]

11.8 40 CFR 63 Subpart ZZZZ Non-Resettable Hour Meter

In accordance with 40 CFR 63.6655(f), the permittee must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The owner or operator must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engine is used for the purposes specified in 40 CFR 63.6640(f)(2)(ii) or (iii) or 40 CFR 63.6640(f)(4)(ii), the owner or operator must keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes.

[40 CFR 63.6655(f)]

Reporting Requirements

11.9 40 CFR 63 Subpart ZZZZ Notification

In accordance with 40 CFR 63.6595(a)(1), the permittee must comply with the applicable emission limitations and operating limitations no later than October 19, 2013.

[40 CFR 63.6595(a)]

12 Insignificant Activities

12.1 Table 12.1 lists the units or activities that are insignificant on the basis of size or production rate as provided by the permittee. The regulatory citation for units and activities that are insignificant on the basis of size or production rate is IDAPA 58.01.01.317.01.b. There are no monitoring, recordkeeping, or reporting requirements for insignificant emission units or activities beyond those required in the facility-wide permit conditions (see Section 3).

Table 12.1 Insignificant Activities

Description	Insignificant Activities IDAPA 58.01.01.317.01(b)(i) Citation
Operation, loading, and unloading of storage tanks and storage vessels, with lids or other appropriate closures and less than 260-gallon capacity, heated only to the minimum extent necessary to avoid solidification.	(1)
Operation, loading and unloading of storage tanks not greater than 1,100-gallon capacity with lids, not containing hazardous air pollutants and with maximum vapor pressure of 550 mmHg.	(2)
Operation, loading and unloading of volatile organic compound storage tanks, 10,000-gallon capacity or less, with lids or other appropriate closure and vapor pressure no greater than 80 mmHg at 21°C.	(3)
Operation, loading, unloading, and storage of butane, propane, or liquefied petroleum gas (LPF) in storage tanks or vessels less than 40,000-gallon capacity,	(4)
Combustion sources, less than five MMBtu/hr, use exclusively natural gas, butane, propane, and/or LPG.	(5)
Combustion source, not greater than 0.5 MMBtu/hr, if burning waste wood, wood waste, or waste paper.	(8)
Welding using not more than one /day of welding rod.	(9)
“Parylene” coaters using less than 500 gallons of coating per year.	(11)
Printing and silk-screening, using less than two gal/day of a combination of inks, coatings, adhesives, fountain solutions, thinners, retarders, or non-aqueous cleaning solutions.	(12)
Water cooling towers, not using chromium-based corrosion inhibitors, not using barometric jets or condensers, not greater than 10,000 gal/min, and not in direct contact with gaseous or liquid process streams containing regulated air pollutants.	(13)
Industrial water chlorination, less than 20 million gal/day capacity.	(16)
Surface coating, using less than two gal/day.	(17)
Space heaters and hot water heaters using natural gas, propane or kerosene and generating less than five MMBtu/hr.	(5)
Tanks, vessels, and pumping equipment, with lids or other appropriate closure, for storage or dispensing of aqueous solutions of inorganic salts, bases and acids, excluding solutions with: 99% or greater sulfuric or phosphoric acid; 77% or greater nitric acid; 30% or greater hydrochloric acid; or more than one liquid phase where the top phase is more than 1% VOC.	(19)
Equipment, with lids or other appropriate closure, used exclusively to pump, load, unload, or store high-boiling-point organic material, with initial boiling point not less than 150°C or vapor pressure not more than five mmHg at 21°C.	(20)
Milling and grinding activities (paste forms, if used, are less than 1% volatile organic compounds).	(22)
Rolling, forging, drawing, stamping, shearing, and spinning metals.	(23)
Dip-coating operations using materials with less than 1% VOC.	(24)
Surface coating, aqueous solution or suspension containing less than 1% VOC.	(25)

Description	Insignificant Activities IDAPA 58.01.01.317.01(b)(i) Citation
Cleaning and stripping activities and equipment, using solutions having less than 1% volatile organic compounds by weight (no acid cleaning or stripping on metal substrates).	(26)
Storage and handling of water based lubricants for metal working with organic content less than 10%.	(27)
Natural gas-fired space heating units with potential emissions less than or equal to ten percent (10%) of the significant emission rate as defined in IDAPA 58.01.01.006. This includes gas heaters with a maximum heat input rating of 9.3 MMBtu/hr or less (Emission factors from AP-42, Table 1.4-1 based on 1020 Btu/scf natural gas heating value.)	(30)
Process A – DKW (vent from Process Equipment)	(30)
Process B – DXS (vent from Process Equipment)	(30)
Process B – DUO (vent from Process Equipment)	(30)
Process B – DPY (vent from Process Equipment)	(30)
Process B – DPZ (vent from Process Equipment)	(30)
Process B – DUY (vent from Process Equipment)	(30)
Process B – DUZ (vent from Process Equipment)	(30)
Process B – DRY (vent from Process Equipment)	(30)
Process C – ALB (vent from Process Equipment)	(30)
Process C – ALQ (vent from Process Equipment)	(30)
Process C – ALT (vent from Process Equipment)	(30)
Process C – ALY (vent from Process Equipment)	(30)
Process C – ALX (vent from Process Equipment)	(30)
Process C – ALV (vent from Process Equipment)	(30)
Process C – ALW (vent from Process Equipment)	(30)
Process C – AEV (vent from Process Equipment)	(30)
Process C – AEW (vent from Process Equipment)	(30)
Process C – CHY (vent from Process Equipment)	(30)
Process C – CHZ (vent from Process Equipment)	(30)
Process C – CBB (vent from Process Equipment)	(30)
Process C – CTQ (vent from Process Equipment)	(30)
Process C – CTR (vent from Process Equipment)	(30)
Process C – CTS (vent from Process Equipment)	(30)
Process C – TCD (vent from Process Equipment)	(30)
Process C – TCO (vent from Process Equipment)	(30)
Process C – TEM (vent from Process Equipment)	(30)
Process C – TEE (vent from Process Equipment)	(30)
Process C – EUW (vent from Process Equipment)	(30)
Process C – EGS (vent from Process Equipment)	(30)
Process C – EGT (vent from Process Equipment)	(30)
Process C – FIF (vent from Process Equipment)	(30)

[IDAPA 58.01.01.317.01(b)(i), 5/3/2003]

13 General Provisions

General Compliance

13.1 The permittee shall comply with all conditions of this permit. Any permit noncompliance constitutes a violation and is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application.

[IDAPA 58.01.01.322.15.a, 5/1/1994; 40 CFR 70.6(a)(6)(i)]

13.2 It shall not be a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the terms and conditions of this permit.

[IDAPA 58.01.01.322.15.b, 5/1/1994; 40 CFR 70.6(a)(6)(ii)]

13.3 Any permittee who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information.

[IDAPA 58.01.01.315.01, 5/1/1994; 40 CFR 70.5(b)]

Reopening

13.4 This permit may be revised, reopened, revoked and reissued, or terminated for cause. Cause for reopening exists under any of the circumstances listed in IDAPA 58.01.01.386. Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable in accordance with IDAPA 58.01.01.360 through 369.

[IDAPA 58.01.01.322.15.c, 5/1/1994; IDAPA 58.01.01.386, 3/19/1999; 40 CFR 70.7(f)(1), (2); 40 CFR 70.6(a)(6)(iii)]

13.5 The filing of a request by the permittee for a permit revision, revocation and reissuance, or termination or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

[IDAPA 58.01.01.322.15.d, 5/1/1994; 40 CFR 70.6(a)(6)(iii)]

Property Rights

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

[IDAPA 58.01.01.322.15.e, 5/1/1994; 40 CFR 70.6(a)(6)(iv)]

Information Requests

13.7 The permittee shall furnish all information requested by DEQ, within a reasonable time, that DEQ may request 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, 4/5/2000; IDAPA 58.01.01.322.15.f, 4/5/2000; 40 CFR 70.6(a)(6)(v)]

13.8 Upon request, the permittee shall 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, 5/1/1994; IDAPA 58.01.01.128, 4/5/2000; 40 CFR 70.6(a)(6)(v)]

Severability

13.9 The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

[IDAPA 58.01.01.322.15.h, 5/1/1994; 40 CFR 70.6(a)(5)]

Changes Requiring Permit Revision or Notice

13.10 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 shall comply with IDAPA 58.01.01.380 through 386 as applicable.

[IDAPA 58.01.01.200–223, 3/25/2016; IDAPA 58.01.01.322.15.i, 3/19/1999; IDAPA 58.01.01.380–386, 7/1/2002; 40 CFR 70.4(b)(12), (14), (15); 40 CFR 70.7(d), (e)]

13.11 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 Clean Air Act (CAA), 42 United States Code (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, 4/5/2000; IDAPA 58.01.01.209.05, 4/11/2006; 40 CFR 70.4(b)(14), (15)]

Federal and State Enforceability

13.12 Unless specifically identified as a "state-only" provision, all terms and conditions in this permit, including any terms and conditions designed to limit a source's potential to emit, are enforceable: (i) by DEQ in accordance with state law; and (ii) by the United States or any other person in accordance with federal law.

[IDAPA 58.01.01.322.15.j, 5/1/1994; 40 CFR 70.6(b)(1), (2)]

13.13 Provisions specifically identified as a "state-only" provision are enforceable only in accordance with state law. "State-only" provisions are those that are not required under the Federal Clean Air Act or under any of its applicable requirements or those provisions adopted by the state prior to federal approval.

[Idaho Code §39-108; IDAPA 58.01.01.322.15.k, 3/23/1998]

Inspection and Entry

13.14 Upon presentation of credentials, the permittee 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, 5/1/1994; 40 CFR 70.6(c)(2)]

New Applicable Requirements

13.15 The permittee shall comply with applicable requirements that become effective during the permit term on a timely basis.

[IDAPA 58.01.01.322.10, 4/5/2000; IDAPA 58.01.01.314.10.a.ii, 5/1/1994; 40 CFR 70.6(c)(3) citing 70.5(c)(8)]

Fees

13.16 The permittee 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, 4/2/2003; 40 CFR 70.6(a)(7)]

Certification

13.17 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, 5/1/1994; 40 CFR 70.6(a)(3)(iii)(A); 40 CFR 70.5(d)]

Renewal

13.18 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 permittee is encouraged to submit a renewal application nine months prior to the date of expiration.

[IDAPA 58.01.01.313.03, 4/5/2000; 40 CFR 70.5(a)(1)(iii)]

13.19 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, 5/1/1994; 40 CFR 70.7(b)]

Permit Shield

13.20 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 a permittee 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, 4/5/2000; IDAPA 58.01.01.322.15.m, 5/1/1994; IDAPA 58.01.01.325, 3/19/1999; IDAPA 58.01.01.381.04, 382.04, 383.05, 384.03, 385.03, 3/19/1999; 40 CFR 70.6(f)]

Compliance Schedule and Progress Reports

13.21 The permittee shall comply with the following:

- 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, 4/5/2000; IDAPA 58.01.01.314.9, 5/1/1994; IDAPA 58.01.01.314.10, 4/5/2000;40 CFR 70.6(c)(3) and (4)]

Periodic Compliance Certification

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

- The compliance certifications for all emissions units shall be submitted annually from January 1 to December 31 or more frequently if specified by the underlying applicable requirement or elsewhere in this permit by DEQ.
- The initial compliance certification for each emissions unit shall address all of the terms and conditions contained in the Tier I operating permit that are applicable to such emissions unit, including emissions limitations, standards, and work practices.
- The compliance certification shall be in an itemized form providing the following information (provided that the identification of applicable information may cross-reference the permit or previous reports as applicable):
  - The identification of each term or condition of the Tier I operating permit that is the basis of the certification;
  - The identification of the method(s) or other means used by the permittee for determining the compliance status with each term and condition during the certification period. Such methods and other means shall include, at a minimum, the methods and means required under Subsections 322.06, 322.07, and 322.08;
  - The status of compliance with the terms and conditions of the Tier I operating permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in Subsection 322.11.c.ii above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred; and
  - Such information as DEQ may require to determine the compliance status of the emissions unit.

13.23 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, 4/6/2005; 40 CFR 70.6(c)(5)(iii) as amended, 62 Fed. Reg. 54900, 54946 (10/22/1997); 40 CFR 70.6(c)(5)(iv)]

False Statements

13.24 No person shall knowingly 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, 3/23/1998]

No Tampering

13.25 No person shall knowingly 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, 3/23/1998]

Semiannual Monitoring Reports

13.26 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. The permittee's semiannual reporting periods shall be from January 1 to June 30 and July 1 to December 31. All instances of deviations from this operating permit's requirements must be clearly identified in the report. The semiannual reports shall be submitted to DEQ within 30 days of the end of the specified reporting period.

[IDAPA 58.01.01.322.15.q, 3/23/1998; IDAPA 58.01.01.322.08.c, 4/5/2000; 40 CFR 70.6(a)(3)(iii)]

Reporting Deviations and Excess Emissions

13.27 The permittee shall promptly report all deviations from permit requirements including upset conditions, their probable cause, and any corrective actions or preventive measures taken. For excess emissions, the report shall be made in accordance with IDAPA 58.01.01.130–136. For all other deviations, the report shall be made in accordance with IDAPA 58.01.01.322.08.c, unless otherwise specified in this permit.

[IDAPA 58.01.01.322.15.q, 3/23/1998; IDAPA 58.01.01.135, 4/11/2006; 40 CFR 70.6(a)(3)(iii)]

Permit Revision Not Required

13.28 No permit revision shall 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, 4/5/2000; 40 CFR 70.6(a)(8)]

Emergency

13.29 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, 4/5/2000; 40 CFR 70.6(g)]