Statement of Basis

Tier I Operating Permit No. T1-2018.0010
Project ID 62455

Blackfoot Facility of Basic American Foods
Blackfoot, Idaho

Facility ID 011-00012

Final

June 14, 2021
Shawnee Chen, PE SyC
Permit Writer

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

TABLE OF CONTENTS

1. ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE 3

2. INTRODUCTION AND APPLICABILITY 5

3. FACILITY INFORMATION 6

4. APPLICATION SCOPE AND APPLICATION CHRONOLOGY 7

5. EMISSIONS UNITS, PROCESS DESCRIPTION(S), AND EMISSIONS INVENTORY 8

6. EMISSIONS LIMITS AND MRRR 17

7. REGULATORY REVIEW 33

8. PUBLIC COMMENT 40

9. EPA REVIEW OF PROPOSED PERMIT 40

1. ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

ASTM	American Society for Testing and Materials
BAF	Blackfoot Facility of Basic American Foods
BAPCI	Basic American Potato Company, Inc.
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CEMS	continuous emission monitoring systems
CFR	Code of Federal Regulations
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
IEDM	internal electronic data management
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
lb/hr	pounds per hour
m	meters
MACT	Maximum Achievable Control Technology
MMBtu	million British thermal units
MMBtu/hr	million British thermal units per hour
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
Rules	*Rules for the Control of Air Pollution in Idaho*
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
TAP	toxic air pollutants

ULSD	ultra low sulfur diesel
U.S.C.	United States Code
VOC	volatile organic compound

2. INTRODUCTION AND APPLICABILITY

Blackfoot Facility of Basic American Foods, A Division of Basic American, Inc. (BAF) is a manufacturer of dried food products, and is located at 415 West Collins Road, Blackfoot.

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

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

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

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

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

Section 1 – Acronyms, Units, and Chemical Nomenclature

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

Section 2 – Tier I Operating Permit Scope

The scope describes this permitting action.

Section 3 – Facility-Wide Conditions

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

Sections 4 through 11 – Boilers, Process A, Process B, Process C, Process C-8, Plant Space Heaters, and an Emergency Engine

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

Section 12 Insignificant Activities

This section contains a list of units or activities that are insignificant on the basis of size or production rate. Units and activities listed in this section must be listed in the permit application. 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.

Section 13 - General Provisions

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

3. FACILITY INFORMATION

3.1 Facility Description

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

This Tier I operating permit is for the BAF plant, which is located south of U.S. Highway 26 and about two miles northwest of Blackfoot. The BAF plant includes a food dehydrating plant and a co-located research and development laboratory related to vegetable dehydrating and product development. The Blackfoot plant produces dehydrated food products using a variety of drying and dehydration processes. Products are dried by contact with heated air. Drying air is heated either by direct-firing with natural gas or indirectly using steam heat exchangers. Steam for plant operations is provided by Boiler Numbers 2A and 3.

Material transport occurs both internally and within a processing activity and externally to transfer materials between process, to place them into or take them out of bulk storage, or to transport them to packaging and load out activities. Air suspension systems are used to transport granules and most formulated products. Belt and bucket conveyors are used to transport raw material, products in processing and finished products. All bucket and belt conveyors are entirely contained within enclosed buildings. BAF also uses wet flumes to transport raw potatoes.

3.2 Facility Permitting History for BAF

Tier I Operating Permit History - Previous 5-year permit term July 25, 2013 to July 25, 2018

The following information is the permitting history of this Tier I facility during the previous five-year permit term which was from July 25, 2013 to July 25, 2013. This information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

July 25, 2013	T1-2012.0030, project 61508, Title V Permit renewal, Permit status (S)

Tier I Operating Permit History - Current permit term March 22, 2019 to present

March 22, 2019	T1-2018.0010 PROJ 62001, Title V permit renewal for BAF Blackfoot facility, Permit status (A, but will become upon issuance of this permit)

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

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

December 27, 1975	PTC Letter, issued December 27, 1975 (S)
November 12, 1982	PTC Letter, issued November 12, 1982 (S)
April 27, 1995	PTC No. 011-000012, issued April 27, 1995 (S)
March 22, 2004	PTC No. P-040300, issued March 22, 2004 (S)
August 23, 2004	Consent Order issued, Case No. E-010007 dated August 20, 2004
September 16, 2005	PTC No. P-050301, issued September 16, 2005 (replaced PTC No. 040300 issued March 22, 2004) (S)
December 6, 2005	BAF requested closure of the consent order for Case No. E-010007
January 23, 2006	DEQ terminated the consent order for Case No. E-010007
August 29, 2009	P-2009.0042, Natural gas finish dryer (S)
November 30, 2010	Consent Order issued, Case No. E-2010.0017, closed February 1, 2013
January 20, 2011	P-2009.0043, FEC permit established, replaces P-2009.0042 (S)
July 31, 2017	P-2017.0011, Project 61851, Initial PTC to install equipment for C-8 process (S)
September 12, 2017	P-2017.0031, Project 61894, Initial PTC to replace 2 boilers with a gas boiler (A)
July 27, 2018	P-2009.0043, Project 61536 to convert FEC to PTC, replaces P-2009.0043 issued January 20, 2011 (A)
January 18, 2019	P-2017.0011, Project 62167, DEQ initiated PTC revision to remove a non-applicable permit condition for C-8 process (S)
April 16, 2021	P-2017.0011, Project 62449, Permit modification to increase $PM_{2.5}$ and PM_{10} emissions limits for the pre-dryer of the C-8 production line (A)

4. APPLICATION SCOPE AND APPLICATION CHRONOLOGY

4.1 Application Scope

This permit is the amendment to incorporate the PTC No. P-2017.0011 PROJ 62449 issued on April 16, 2021 to the facility's currently effective Tier I operating permit.

The revised PTC application (2020AAG2140) requested DEQ to incorporate the PTC in accordance with IDAPA 58.01.001.209.05.a (i.e., at the time of renewal.) Because the emissions limits in the facility's currently effective Tier I operating permit are more stringent than the ones in the PTC, it prevents the facility to operate under the higher new emissions limits. Therefore, DEQ is incorporating the PTC in accordance with IDAPA 58.01.001.209.05.b instead of IDAPA58.01.01209.05.a.

4.2 Application Chronology

May 13, 2020	DEQ received an application.
June 12, 2020	DEQ determined that the application was incomplete.
April 16, 2021	the underlying PTC was issued.
May 7, 2021	DEQ determined that the application was complete.
June 2, 2021	DEQ made available the draft permit and statement of basis for peer and regional office review.

June 14, 2021 DEQ issued the final permit and statement of basis.

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

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

5.1 Process No. 1 – Regulated Sources of Carbon Monoxide

The following table lists the emissions units and control devices associated with sources that have carbon monoxide regulated by the underlying PTC P-2017.0031.

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

Production Process	Emissions Unit Description	Control Device (if applicable)	Emission Point ID No.
Blackfoot Facility of Basic American Foods (BAF)			
Plant	Boiler 2A- 91.5 MMBtu/hr, natural gas	Low NOx burners	BLR2A stack
Plant	Boiler 3 - 39 MMBtu/hr, natural gas or low sulfur distillate oil	Good Combustion	BLR3 stack
A	Dryer - 7 MMBtu/hr, natural gas-fired	None	DHT stack
A	Dryer - 7 MMBtu/hr, natural gas-fired	None	DHU stack
A	Dryer - 6 MMBtu/hr, steam heated and natural gas-fired	None	DHZ stack
B	Dryer - 7 MMBtu/hr, natural gas-fired	None	DUQ stack
B	Dryer - 7 MMBtu/hr, natural gas-fired	None	DUT stack
B	Dryer - 7 MMBtu/hr, natural gas-fired	None	DQA stack
B	Dryer - 7 MMBtu/hr, natural gas-fired	None	DQB stack
B	Dryers - Two, each rated at 6 MMBtu/hr, steam heated and natural gas-fired	None	DUV stack
C	Dryer - 3.3 MMBtu/hr, natural gas-fired	None	AEV
C	Dryer - 6.05 MMBtu/hr pre-heater, 4.4 MMBtu/hr front dryer, 6.6 MMBtu/hr rear dryer, all natural gas-fired	None	CXX stack CYY stack
C	Dryer - 10.3 MMBtu/hr, steam heated and natural gas-fired, with a 2.9 MMBtu/hr pre-heater, natural gas-fired	None	CHX stack
C	Dryer - 4.6 MMBtu/hr	None	CHY stack
C	Dryer - 2.3 MMBtu/hr	None	CHZ stack
C	Dryer - 6 MMBtu/hr, natural gas-fired	None	HEB stack
C	Dryer - 3.22 MMBtu/hr, natural gas-fired	None	HNL stack
C	Dryer - 1.5 MMBtu/hr, natural gas-fired	None	CBB stack
C	Dryer - 12 MMBtu/hr, natural gas-fired	None	CNV stack
C	Dryer - 12 MMBtu/hr, natural gas-fired	None	CNW stack
C	Dryer - 4 MMBtu/hr, natural gas-fired	None	CTQ stack
C	Dryer - 6.6 MMBtu/hr, natural gas-fired	None	CTR
C	Dryer - 8.8 MMBtu/hr, natural gas-fired	None	CTS
C	Dryer - 9.7 MMBtu/hr, natural gas-fired	None	CTT
C	Dryer - 2 MMBtu/hr, natural gas-fired	None	TCD
C	Dryer - 1.3 MMBtu/hr, natural gas-fired	None	TAC
C	Dryer - 1.3 MMBtu/hr, natural gas-fired	None	TAH
C-8	Pre-dryer stack	None	NND
	Dryer stack	Wet Venturi Scrubber	NNG
Plant	Space Heaters (Air Makeup Units)	None	Heaters

Production Process	Emissions Unit Description	Control Device (if applicable)	Emission Point ID No.
Blackfoot Basic American Potato Company, Inc. (BAPCI)			
Boilers	Boilers East Processing Boiler West Processing Boiler Dehydration North Boiler Dehydration South Boiler	Low-NOx burner None None None	EU_01 EU_02 EU_20 EU_21
Dryers	Dryers Dehydration Air Dryer 1 Dehydration Air Dryer 2 Dehydration Air Dryer 3 Dehydration Bin Dryer	None	EU_23,24,25 EU_24,25,26 EU_26,27,28 EU_34
Heaters	Heaters - Air Makeups and Room Heaters	None	

5.2 Process No. 2 - BOILERS 2A AND 3

The following table lists the emissions units and control devices associated with Boilers 2A and 3.

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

Emissions Unit Description	Control Device (if applicable)	Emission Point ID No.
Boiler 2A	Low NOx burner	Boiler 2A Stack
Boiler 3	None	Boiler 3 Stack

Two plant boilers that provide process steam to the production lines at BAF. Boiler 2A burns natural gas only and uses a low NOx burner to lower NOx emissions Boiler 3 burns either natural gas or distillate oil. Boiler 3's emissions are uncontrolled.

5.3 Process No. 3 – PROCESS A

The following table lists the emissions units and control devices associated with Process A.

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

Emissions Unit Description	Control Device (if applicable)	Emission Point ID No.
DHQ- cooler 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)	None	DHQ stack DHT stack DHU stack DHZ stack

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. The drying unit processes can potentially emit SO_2 from the conversion of sulfites. Drying heat is provided by both natural gas combustion and steam produced by the plant's boilers.

5.4 Process No. 4 – PROCESS B

The following table lists the emissions units and control devices associated with Process B.

Table 5.4 EMISSIONS UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION

Emissions Unit Description		Control Device (if applicable)	Emission Point ID No.
DUQ	dryer (7 MMBtu/hr natural gas-fired)	None	DUQ - stack
DUT	dryer (7 MMBtu/hr natural gas-fired) ,		DUT - stack
DUV	2 dryers (6 MMBtu/hr each, steam and natural gas-fired)		DUV – stack
DQA	dryer (7 MMBtu/hr natural gas-fired)		DQA - stack
DQB	dryer (7 MMBtu/hr natural gas-fired)		DQB - stack

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. The drying unit processes can potentially emit SO_2 from the conversion of sulfites. Drying heat is provided by both natural gas combustion and steam produced by the plant's boilers.

5.5 Process No. 5 – PROCESS C

The following table lists the emissions units and control devices associated with Process C.

Table 5.5 EMISSIONS UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION

Emissions Unit Description		Control Device (if applicable)	Emission Point ID No.
CIR	Dryer – Steam heated	RotoClone (Wet Dust Collector)	CIR stack
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	CXX/CYY stacks
CHX	Dryer - 10.3 MMBtu/hr, steam heated and natural gas-fired, with a 2.9 MMBtu/hr pre-heater, natural gas-fired		CHX stack
HEB	Dryer - 6 MMBtu/hr, natural gas-fired		HEB stack
CBB	Dryer - 1.5 MMBtu/hr, natural gas-fired		CBB stack
CNV	Dryer - 12 MMBtu/hr, natural gas-fired		CNV stack
CNW	Dryer - 12 MMBtu/hr, natural gas-fired		CNW stack
CTU	Dryer - Steam heated		CTU stack
CTZ	Dryer - 5.75 MMBtu/hr, natural gas-fired	Low-NO_X burner	CTZ stack

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. The process equipment can potentially emit SO_2 from the conversion of sulfites. Drying heat is provided by steam produced by the plant's boilers and natural gas-fired heaters.

5.6 Process No. 6. – PROCESS C-8

The following table lists the emissions units and control devices associated with Process C-8.

Table 5.6 EMISSIONS UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION

Emissions Unit Description		Control Device (if applicable)	Emission Point ID No.
NND	Pre-dryer – 6.0 MMBtu/hr first stage, 2.0 MMBtu/hr second stage, natural gas-fired	Low-NO_X burner	NND stack
NNG	Dryer – 12.2 MMBtu/hr, natural gas-fired	Low-NO_X burner Wet Venturi Scrubber	NNG stack
Air Makeup Unit	5.0 MMBtu/hr, natural gas-fired	None	NND/NNG stacks

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 has been installed to reduce particulate emissions from the dryer. Particulate emissions from the pre-dryer are 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.

5.7 Process No. 7 – PLANT SPACE HEATERS

The following table lists the emissions units and control devices associated with the plant space heaters.

Table 5.7 EMISSIONS UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION

Emissions Unit Description	Control Device (if applicable)
Plant Space heaters (combined) -77.0 MMBtu/hr, natural gas-fired	None

The BAF Blackfoot Facility has natural gas-fired space heaters ranging in size from less than 200,000 Btu/hr to 7.5 MMBtu/hr. At the time of permit issuance, total space heater combustion capacity is 59.5 MMBtu/hr. Most of the units provide direct heating; i.e., the combustion air from the unit is discharged directly into the room to provide heating. The Reyco Slice heater is the only space heater with specific permit conditions.

5.8 Process No. 8 – EMERGENCY ENGINE

The following table lists the emissions units and control devices associated with the generator.

Table 5.8 EMISSIONS UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION

Emissions Unit Description	Control Device (if applicable)
Emergency Engine: propane-fired	None

The BAF Blackfoot Facility operates an emergency propane-fired generator.

5.9 Insignificant Emissions Units Based on Size or Production Rate

This section contains a list of units or activities that are insignificant on the basis of size or production rate. Units and activities listed in this section must be listed in the permit application. Table 5.9 lists the units and activities which have been determined to be insignificant on the basis of size or production rate. The regulatory authority for emissions units and activities that are insignificant on the basis of size or production rate is IDAPA 58.01.01.317.01.b.

Table 5.9 INSIGNIFICANT EMISSION UNITS AND REGULATORY AUTHORITY/JUSTIFICATION

Emissions Unit / Activity	Regulatory Authority / Justification
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)

Emissions Unit / Activity	Regulatory Authority / Justification
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.	(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)

Insignificant activities that are listed in Permit Condition 12.1, Table 12.1, based on the regulatory citation of IDAPA 58.01.01.317.01.b.i.1 are required to be operation, loading, and unloading of storage tanks and storage vessels, with lids or other appropriate closure and less than two hundred sixty (260) gallon capacity thirty five cubic feet (35cft), heated only to the minimum extent to avoid solidification if necessary.

Insignificant activities that are listed in Permit Condition 12.1, Table 12.1, based on the regulatory citation of IDAPA 58.01.01.317.01.b.i.2 are required to be operation, loading and unloading of storage

tanks, not greater than one thousand one hundred (1,100) gallon capacity, with lids or other appropriate closure, not for use with hazardous air pollutants, maximum (max.) vp five-hundred fifty (550) mm Hg.

Insignificant activities that are listed in Permit Condition 12.1, Table 12.1, based on the regulatory citation of IDAPA 58.01.01.317.01.b.i.3 are required to be operation, loading and unloading of volatile organic compound storage tanks, ten thousand (10,000) gallons capacity or less, with lids or other appropriate closure, vp not greater than eighty (80) mm Hg at twenty-one (21) degrees C. Operation, loading and unloading of gasoline storage tanks, ten thousand (10,000) gallons capacity or less, with lids or other appropriate closure.

Insignificant activities that are listed in Permit Condition 12.1, Table 12.1, based on the regulatory citation of IDAPA 58.01.01.317.01.b.i.4 are required to include only operation, loading and unloading storage of butane, propane, or liquefied petroleum gas (LPG), storage tanks, vessel capacity under forty thousand (40,000) gallons.

Insignificant activities that are listed in Permit Condition 12.1, Table 12.1, based on the regulatory citation of IDAPA 58.01.01.317.01.b.i.5 are required to include only a combustion source, less than five million (5,000,000) Btu/hr, exclusively using natural gas, butane, propane, and/or LPG.

Insignificant activities that are listed in Permit Condition 12.1, Table 12.1, based on the regulatory citation of IDAPA 58.01.01.317.01.b.i.8 are required to include only a combustion source, not greater than five hundred thousand (500,000) Btu/hr, if burning waste wood, wood waste or waste paper.

Insignificant activities that are listed in Permit Condition 12.1, Table 12.1, based on the regulatory citation of IDAPA 58.01.01.317.01.b.i.9 are required to be welding using not more than one (1) ton per day of welding rod.

Insignificant activities that are listed in Permit Condition 12.1, Table 12.1, based on the regulatory citation of IDAPA 58.01.01.317.01.b.i.11 are required to include only “Parylene” coaters using less than five hundred (500) gallons of coating per year.

Insignificant activities that are listed in Permit Condition 12.1, Table 12.1, based on the regulatory citation of IDAPA 58.01.01.317.01.b.i.12 are required to be printing and silkscreening, using less than two (2) gallon/day of any combination of the following: Inks, coatings, adhesives, fountain solutions, thinners, retarders, or nonaqueous cleaning solutions.

Insignificant activities that are listed in Permit Condition 12.1, Table 12.1, based on the regulatory citation of IDAPA 58.01.01.317.01.b.i.13 are required to be water cooling towers and ponds, not using chromium-based corrosion inhibitors, not used with barometric jets or condensers, not greater than ten thousand (10,000) gpm, not in direct contact with gaseous or liquid process streams containing regulated air pollutants.

Insignificant activities that are listed in Permit Condition 12.1, Table 12.1, based on the regulatory citation of IDAPA 58.01.01.317.01.b.i.16 are required to be municipal and industrial water chlorination facilities of not greater than twenty million (20,000,000) gallons per day capacity. The exemption does not apply to waste water treatment.

Insignificant activities that are listed in Permit Condition 12.1, Table 12.1, based on the regulatory citation of IDAPA 58.01.01.317.01.b.i.17 are required to be surface coating, using less than two (2) gallons per day.

Insignificant activities that are listed in Permit Condition 12.1, Table 12.1, based on the regulatory citation of IDAPA 58.01.01.317.01.b.i.19 are required to be 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:

(a) Ninety-nine percent (99%) or greater H_2SO_4 or H_3PO_4

(b) Seventy percent (70%) or greater HNO_3.

(c) Thirty percent (30%) or greater HC1.

(d) More than one (1) liquid phase where the top phase is more than one percent (1%) volatile organic

compounds.

Insignificant activities that are listed in Permit Condition 12.1, Table 12.1, based on the regulatory citation of IDAPA 58.01.01.317.01.b.i.20 are required to include only equipment used exclusively to pump, load, unload, or store high boiling point organic material, material with initial boiling point (IBP) not less than one hundred fifty (150) degrees C or vapor pressure (vp) not more than five (5) mm Hg at twenty-one (21) degrees C with lids or other appropriate closure.

Insignificant activities that are listed in Permit Condition 12.1, Table 12.1, based on the regulatory citation of IDAPA 58.01.01.317.01.b.i.22 are required to be milling and grinding activities, using paste-form compounds with less than one percent (1%) volatile organic compounds.

Insignificant activities that are listed in Permit Condition 12.1, Table 12.1, based on the regulatory citation of IDAPA 58.01.01.317.01.b.i.23 are required to be rolling, forging, drawing, stamping, shearing, or spinning hot or cold metals.

Insignificant activities that are listed in Permit Condition 12.1, Table 12.1, based on the regulatory citation of IDAPA 58.01.01.317.01.b.i.24 are required to be dip-coating operations, using materials with less than one percent (1%) volatile organic compounds.

Insignificant activities that are listed in Permit Condition 12.1, Table 12.1, based on the regulatory citation of IDAPA 58.01.01.317.01.b.i.25 are required to include only surface coating, aqueous solution or suspension containing less than one percent (1%) volatile organic compounds.

Insignificant activities that are listed in Permit Condition 12.1, Table 12.1, based on the regulatory citation of IDAPA 58.01.01.317.01.b.i.26 are required to be cleaning and stripping activities and equipment, using solutions having less than one percent (1%) volatile organic compounds by weight. On metallic substrates, acid solutions are not considered for listing as insignificant.

Insignificant activities that are listed in Permit Condition 12.1, Table 12.1, based on the regulatory citation of IDAPA 58.01.01.317.01.b.i.27 are required to be storage and handling of water based lubricants for metal working where the organic content of the lubricant is less than ten percent (10%).

Insignificant activities that are listed in Permit Condition 12.1, Table 12.1, based on the regulatory citation of IDAPA 58.01.01.317.01.b.i.30 are required to be an emission unit or activity with potential emissions less than or equal to the significant emission rate as defined in Section 006 and actual emissions less than or equal to ten percent (10%) of the levels contained in Section 006 of the definition of significant and no more than one (1) ton per year of any hazardous air pollutant.

5.10 Emissions Inventory

Table 5.10 summarizes the emissions inventory for this major facility. All values are expressed in units of tons-per-year and represent the facility's potential to emit. Potential to emit is defined as the maximum capacity of a facility or stationary source to emit an air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or source to emit an air pollutant, including air pollution control equipment and restrictions on hour of operation or on the type or amount of material combusted, stored or processed shall be treated as part of its design if the limitation or the effect it would have on emission is state or federally enforceable.

Table 5.10 EMISSIONS INVENTORY - POTENTIAL TO EMIT (T/yr)

Production Process	Source Description	CO (T/yr)	NO_x (T/yr)	SO_2 (T/yr)	PM_{10} (T/yr)	VOC (T/yr)	Lead (T/yr)
Boilers	Boiler 2A	29.6	14.6	0.2	2.99	2.2	1.96E-04
Boilers	Boiler 3	2.2	17.9	1.8	1.53	0.9	3.23E-04
A	DHQ	-	-	-	1.38	-	-
A	DHT	12.3	2.4	0.3	5.06	0.2	1.50E-05

Production Process	Source Description	CO (T/yr)	NO_x (T/yr)	SO_2 (T/yr)	PM_{10} (T/yr)	VOC (T/yr)	Lead (T/yr)
A	DHU	12.3	2.4	0.3	5.06	0.2	1.50E-05
A	DHZ	6.8	1.3	0.5	7.63	0.1	1.29E-05
A	DKV	-	-	-	1.08	-	-
A	DKW	-	-	-	0.03	-	-
B	DXS	-	-	-	0.76	-	-
B	DUO	-	-	-	0.76	-	-
B	DPY	-	-	-	0.76	-	-
B	DPZ	-	-	-	0.76	-	-
B	DUQ	12.3	2.4	0.3	5.06	0.2	1.50E-05
B	DUT	12.3	2.4	0.3	5.06	0.2	1.50E-05
B	DUV	13.7	2.7	1.0	3.58	0.3	2.58E-05
B	DQA	12.3	2.4	0.3	5.06	0.2	1.50E-05
B	DQB	12.3	2.4	0.3	5.06	0.2	1.50E-05
B	DUY	-	-	-	0.07	-	-
B	DUZ	-	-	-	0.07	-	-
B	DSO	-	-	0.1	1.06	-	-
B	DSK	-	-	-	0.18	-	-
B	DRY	-	-	-	0.09	-	-
C	ALB	-	-	0.1	0.44	-	-
C	ALT	-	-	-	0.03	-	-
C	ALQ	-	-	0.1	0.28	-	-
C	ALY	-	-	-	0.01	-	-
C	ALX	-	-	-	0.05	-	-
C	ALV	-	-	0.1	0.72	-	-
C	ALW	-	-	0.1	0.46	-	-
C	AEV	3.8	0.7	0.1	0.48	0.1	7.09E-06
C	AEW	-	-	0.1	0.34	-	-
C	AGQ	-	-	-	0.01	-	-
C	CIR_RTC	-	-	4.1	1.72	-	-
C	CHV	-	-	-	0.03	-	-
C	CXX	11.9	2.6	1.4	7.51	0.3	2.30E-05
C	CYY	10.3	1.5	1.4	7.16	0.2	1.62E-05
C	CHX	6.2	2.7	0.2	1.49	0.2	1.68E-05
C	CHY	3.7	1.6	0.1	0.50	0.1	9.92E-06
C	CHZ	1.8	0.8	0.0	0.26	0.1	4.85E-06
C	TEE	-	-	0.0	0.07	-	-
C	TEM	-	-	0.0	0.07	-	-
C	HEB	2.0	1.3	1.1	6.17	0.3	2.31E-05
C	HNL	0.6	0.4	0.2	1.37	0.1	6.91E-06
C	CBB	1.7	0.3	0.4	0.79	0.0	3.22E-06
C	CTQ	4.6	0.9	0.3	0.63	0.1	8.60E-06
C	CTR	7.5	1.5	0.3	0.61	0.2	1.41E-05
C	CTS	10.0	2.0	0.2	0.19	0.2	1.89E-05
C	CTT	11.0	2.2	0.2	0.16	0.2	2.08E-05
C	CNV	13.7	2.7	0.2	0.58	0.3	2.58E-05
C	CNW	13.7	2.7	0.2	0.59	0.3	2.58E-05
C	CTU	-	-	0.5	3.96	-	-
C	CTZ	0.7	0.5	0.4	1.00	0.3	2.32E-05
C	TCD	2.3	0.4	0.5	0.15	0.0	4.29E-06

Production Process	Source Description	CO (T/yr)	NO_x (T/yr)	SO_2 (T/yr)	PM_{10} (T/yr)	VOC (T/yr)	Lead (T/yr)
C	TCO	-	-	-	0.15	-	-
C	TAC	1.4	0.3	0.1	0.69	0.0	2.68E-06
C	TAH	1.4	0.3	0.1	0.69	0.0	2.68E-06
C	EUW	-	-	-	0.02	-	-
C	SUF	-	-	-	0.02	-	-
C	DSX	-	-	-	0.04	-	-
C	EGS	-	-	-	0.04	-	-
C	EGT	-	-	-	0.04	-	-
C	FIF	-	-	-	0.13	-	-
C-8	NND	2.9	1.1	0.1	1.26 [2]	0.2	1.72E-05
C-8	NNG	1.8	0.5	0.1	0.57	0.1	1.07E-05
C-8	C-8 AMU	1.8	-	-	-	0.1	5.37E-06
Total BAF Point Sources		**240.6**	**77.6**	**18.2**	**94.2**	**7.7**	**9.39E-04**
Plant	Heaters	14.0	16.7	0.4	1.27	0.9	8.33E-05
Plant	Fugitive Dust	-	-	-	3.07	-	-
Total BAF Fugitive Sources		**14.0**	**16.7**	**0.4**	**4.3**	**0.9**	**8.33E-05**
Total BAPCI[1] Sources		**58.8**	**49.9**	**0.4**	**78.1**	**3.9**	**3.46E-04**
Facility-Wide PTE		**195**[3]	**127.5**	**18.6**	**173.2**	**11.6**	**1.29E-03**

[1] Taken from the Statement of Basis for PTC No. P-2010.0057 Project 62080, issued to BAPCI on September 14, 2018.

[2] $PM_{2.5}/PM_{10}$ emissions rate taken from PTC No. P-2017.0011 Project 62449, issued to BAF on April 16, 2021.

[3] The facility-wide CO emissions limit taken from PTC No. P-2017.0031 Project 61894 issued on September 12, 2017. The facility here means BAF and BAPCI.

For details on the emissions inventory, please refer to the statement of basis for Tier I No. T1-2018.0010 PROJ 62001 issued on March 22, 2019. For $PM_{2.5}/PM_{10}$ emissions from NND stack (pre-dryer stack of Production Line C-8), refer to the statement of basis for PTC No. P-2017.0011 Project 62449 issued on April 16, 2021.

The emission estimates are explained in the emissions inventory appendix spreadsheets for the Tier I No. T1-2018.0010 PROJ 62001 issued on March 22, 2019.

The PM_{10}, SO_2, CO, and NO_x estimates for the boilers are based on enforceable limits from P-2017.0031 issued September 12, 2017. The VOC estimates were based on AP-42 for the highest emitting fuel.

Emissions estimates for process equipment, including process burners, are based on voluntary source tests done by the facility at various times since 1995. This testing has been done because of the lack of standard emission factors for BAF processes, many of which are proprietary or unique. Development and use of emission factors has been documented in previous permitting actions for the facility through the issuance of Permit to Construct No. 2009.0043, issued January 20, 2011. SO_2 emission factors for natural gas combustion in process dryers and space heaters are derived from AP-42 and assume 0.8 grains of sulfur per 100 scf of gas combusted. SO_2 emissions associated with conversion of sulfite are based on BAF experience with sulfite conversion in drying processes.

To estimate annual emissions the emission factors are generally used assuming that equipment operates 8,760 hours per year at full capacity, with the exception that space heaters are assumed to operate no more than 4,380 hours years (50% duty). Plant space heaters are designed and sized for comfort space heating during cold weather periods. During warm weather periods the heaters are not needed and do not operate. BAF will demonstrate compliance with these calculated space heater emission limits from emission calculations based on natural gas usage as is described in section 10 of the permit.

6. EMISSIONS LIMITS AND MRRR

This section contains the applicable requirements for this T1 facility.

This section is divided into the following subsections.

- Facility-Wide Conditions;
- Facility-Wide CO Limit;
- Boiler 2A and Boiler 3;
- Process A Emissions Limits;
- Process B Emissions Limits;
- Process C Emissions Limits;
- Production Line C-8;
- Plant Space Heaters;
- Emergency Engine;
- Tier I Operating Permit General Provisions

MRRR

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

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

State Enforceability

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

Federal Enforceability

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

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

6.1 *Facility-Wide Conditions*

Permit Condition 3.1 - Fugitive Dust

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

[IDAPA 58.01.01.650-651, 3/30/2007]

MRRR (Permit Conditions 3.2 through 3.4)

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

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

Permit Condition 3.5 - Odors

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

[IDAPA 58.01.01.775-776 (State-only), 5/1/1994]

MRRR (Permit Condition 3.6)

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

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

Permit Condition 3.7 - Visible Emissions

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

[IDAPA 58.01.01.625, 4/5/2000]

MRRR (Permit Condition 3.8 through 3.9)

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

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

Permit Conditions 3.10 through 3.14 - Excess Emissions

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

[IDAPA 58.01.01.130-136, 4/5/2000]

MRRR (Permit Conditions 3.11 through 3.14)

- Take appropriate action to correct, reduce, and minimize emissions from excess emissions events;
- Prohibit excess emissions during any DEQ Atmospheric Stagnation Advisory or Wood Stove Curtailment Advisory; and

- Notify DEQ of each excess emissions events as soon as possible, including information regarding upset, breakdown, or safety events.
- Submit a report for each excess emissions event to DEQ; and
- Maintain records of each excess emissions event.

[IDAPA 58.01.01.130-136, 4/5/2000]

Permit Condition 3.15 – Fuel-Burning Equipment PM Standards

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

MRRR

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

Permit Condition 3.16 - Sulfur Content Limits

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.
- Coal containing greater than 1.0% sulfur 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, SO2 emissions are equal to or less than those resulting from the combustion of fuels complying with these limitations.

[IDAPA 58.01.01.725, 3/29/2010]

MRRR - (Permit Condition 3.17)

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

[IDAPA 58.01.01.322.06, 5/1/1994]

Permit Condition 3.18 - Open Burning

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

[IDAPA 58.01.01.600-623, 5/08/2009]

MRRR

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

Permit Condition 3.19 - Asbestos

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

[40 CFR 61, Subpart M]

MRRR

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

Permit Condition 3.20 - Accidental Release Prevention

(a)

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

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

[40 CFR 68.10 (a)]

(b)

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

[40 CFR 68.215(a)(2); IDAPA 58.01.01.322.11, 4/6/2005; 40 CFR 68.215(a)(ii)]

MRRR

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

Permit Condition 3.21 - Recycling and Emissions Reductions

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

[40 CFR 82, Subpart F]

MRRR

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

Permit Condition 3.22 through 3.23- NSPS/NESHAP General Provisions

This plant is subject to NSPS Subpart Dc and NESHAP Subparts ZZZZ and JJJJJJ (if distillate fuel oil is combusted in Boiler 3), and is therefore required to comply with applicable General Provisions.

[40 CFR 60/63, Subpart A]

MRRR

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

Permit Condition 3.24 - Monitoring and Recordkeeping

The permittee shall maintain sufficient records to assure compliance with all of the terms and conditions of this operating permit. Records of monitoring information shall include, but not be limited to, the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or

methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

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

MRRR

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

Permit Conditions 3.25 through 3.28 - Performance Testing

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

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

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

[IDAPA 58.01.01.157, 4/5/2000; IDAPA 58.01.01.322.06, 08.a, 09, 5/1/1994]

MRRR (Permit Conditions 3.26 and 3.28)

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

[IDAPA 58.01.01.157, 4/5/2000; IDAPA 58.01.01.322.06, 08.a, 09, 5/1/1994]

Permit Condition 3.29 - Reports and Certifications

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

[IDAPA 58.01.01.322.08, 11, 5/1/1994]

MRRR

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

Permit Condition 3.30 - Incorporation of Federal Requirements by Reference

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

[IDAPA 58.01.01.107, 4/7/0211]

MRRR

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

6.2 *Emissions Unit-Specific Emissions Limits and MRRR*

Facility Wide Carbon Monoxide Emission Limits and MRRR

Permit Condition 4.1 - CO Emission Limits

The facility-wide carbon monoxide (CO) emissions shall not exceed 195 T/yr.

MRRR - (Permit Conditions 4.2, 4.3, and 4.4)

The facility has taken an enforceable facility-wide CO emission limit of 195 T/yr, including BAF and BAPCI. CO emissions shall be calculated and recorded for all combustion sources each calendar month. A rolling 12-month total of CO emissions shall be calculated and recorded for each calendar month. Emission totals shall be available within 30 days of the end of a month. The permittee shall total CO emission as calculated for the combustion sources and the production sources to determine compliance with the annual facility-wide (BAF and BAPCI) CO limit.

Boiler 2A and Boiler 3 Emission Limits and MRRR

Permit Condition 5.1 through 5.3 - Emission 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.

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.

If fuel oil is combusted in Boiler 3, emissions from the Boiler 3 stacks, or any other stack, vent, or functionally equivalent opening associated with the Boiler 3, shall be evaluated for visual emissions as described in Permit Condition 3.7.

MRRR - (Permit Condition 5.4 through 5.13)

The facility is required to comply with the emission standards during operation of the boilers. The facility is required to ensure fuel supply lines to previously used Boiler Nos. 1 and 2 have been removed and Boiler 2A, which is allowed to burn natural gas only, is required to exhaust to the 100-foot tall stack previously served Boiler Nos. 1 and 2. If fuel oil is combusted in Boiler 3, the facility shall comply with provisions of 40 CFR 63 JJJJJJ and conduct visual emission evaluations as described in Permit Condition 5.3 and 3.7 In addition, the facility may need an off-permit change if the facility uses oil in Boiler 3.

MRRR - (Permit Condition 5.14)

An initial performance test has been conducted and DEQ issued a performance test approval letter January 18, 2019 (IEDM document number 2019AAI186). The test was performed in accordance with IDAPA 58.01.01.157.02(a) and demonstrated compliance with NOx and CO emission limits in Permit Condition 5.1. Therefore, the requirements of Permit Condition 5.14 have been met.

MRRR - (Permit Condition 5.15-5.17)

Boiler 2A is subject to 20 CFR 60 Subpart Dc**.** The permittee shall record and maintain records of the amount of fuel combusted during each calendar month. These records shall be made available to DEQ upon request.

Process A Emission Limits and MRRR

Permit Condition 6.1 – Emission 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.

MRRR - (Permit Condition 6.4 through 6.7)

Dryers shall combust only natural gas or be heated by steam from the plant boilers. Daily dried food products throughput monitoring, including additives, is required. $PM_{2.5}$ and PM_{10} compliance must be demonstrated with daily 24-hour and yearly rolling 12-month average $PM_{2.5}$ and PM_{10} limits. Emission factors shall be from the most recent performance test or approved by DEQ. Records shall be maintained on site for the most recent 5-year period and be made available to DEQ upon request.

Permit Condition 6.2 – PM Emission 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,

$E = 1.12(PW)^{0.27}$

MRRR - (Permit Condition 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.

Permit Condition 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.

MRRR - (Permit Condition 3.7 through 3.9)

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

Process B Emission Limits and MRRR

Permit Condition 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.

MRRR - (Permit Condition 7.3 through 7.6)

Dryers shall combust only natural gas or be heated by steam from the plant boilers. Daily dried food products throughput monitoring, including additives, is required. $PM_{2.5}$ and PM_{10} compliance must be demonstrated with daily 24-hour and yearly rolling 12-month average $PM_{2.5}$ and PM_{10} limits. Emission factors shall be from the most recent performance test or approved by DEQ. Records shall be maintained on site for the most recent 5-year period and be made available to DEQ upon request.

Permit Condition 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.

MRRR - (Permit Condition 3.7 through 3.9)

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

of the conditions existing at the time visible emissions are present, any corrective action taken, and the date of the corrective action.

Process C Emission Limits and MRRR

Permit Condition 8.1 – Emissions Limits

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

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.

MRRR - (Permit Condition 8.3 through 8.4 and 8.6 through 8.7)

Dryers shall combust only natural gas or be heated by steam from the plant boilers. Daily dried food products throughput monitoring, including additives, is required. $PM_{2.5}$ and PM_{10} compliance must be demonstrated with daily 24-hour and yearly rolling 12-month average $PM_{2.5}$ and PM_{10} limits. Emission factors shall be from the most recent performance test or approved by DEQ. Records shall be maintained on site for the most recent 5-year period and be made available to DEQ upon request.

MRRR - (Permit Condition 8.5)

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.

Permit Condition 8.2 – 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.

MRRR - (Permit Conditions 3.7 through 3.9)

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

Production Line C-8

Permit Condition 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 [e]	8.10	1.26	11.48	0.013	0.058	0.289	1.14	1.48
Dryer 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 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.

MRRR - (Permit Condition 9.3 through 9.6)

The operating requirements of the maximum allwable steam usage of 920 lb/hr for Prodution Line C-8, the maximum finished prodcut production limit of 70,000 lb/day, and the use of Low NOx burners with natural gas as an only allowable fuel were all used in the permitting analysis for P-2017.0011, issued July 31, 2017. The analysis included emissions estimation, major modification test for PSD applicability determination, and the modeling analysis.

The annual production limit of 21.7 million pounds per year was added to PTC No. P-2017.0011 PROJ 62449 issued on April 16, 2021. It is for ensuring compliance with the annaul $PM_{2.5}$ NAAQS.

MRRR - (Permit Condition 9.7)

The facility uses an EnviroCare MicroMist Scrubber that uses a multi-tube Venture stage for wet scrubbing. A 75% particulate control efficiency was guaranteed when the pressure drop is 17 inches of water or greater at the MicroMist venturi stage and when the inlet water flow is 178 gpm or greater.

The facility has updated the operating paramters ranges based on the most recent performance test (tested on 5/30/2019) that demonstrated compliance with the emissions limits. The minimum pressure drop is now 17.5 inches of water, and the minimum recirculation rate is now 265 gallons per minute.

MRRR - (Permit Condition 9.8)

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.

MRRR - (Permit Condition 9.9)

The permittee shall monitor and record the daily finished product produced from production line C-8 to demonstrate compliance with the finished product production rate limits in Permit Condition 9.5.

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

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

MRRR - (Permit Condition 9.10)

Documentation must be maintained that shows the air make-up unit, pre-dryer, and dryer meet the low NOx burner requirement. Manufacturer or vendor technical specifications for installed equipment are

acceptable documentation. However, having the documentation does not preclude an inspector from checking the plates of the equipment to determine compliance.

MRRR - (Permit Condition 9.11)

Standard monitoring of the Venturi Scrubber includes monitoring and recording of the pressure drop across the throat at the MicroMist Venturi stage of the scrubber in inches of water once per operating shift and scrubbing liquid recirculation rate in gallons per minute weekly.

MRRR - (Permit Condition 9.12)

Permit condition 9.12 is revised because the applicant has fulfilled initial source test requirement. "Within 180 days…" is replaced with "If additional source testing is performed".

Permit Condition 9.12 specifies that if a source test is required, both the pre-dryer and dryer will be required to be tested approximately the same time, such as in two consecutive days. Permit Condition 9.12 also specifies what needs to be monitored during a source test. The following explains why:

During the virtual meeting with the facility on October 6, 2020, the facility's consultant mentioned that during the first time initial source testing, the pre-dryer was okay, but the dryer exceeded the limit at 70,000 lb/day; after the adjustment to the scrubber, the dryer met the limit, but the pre-dryer exceeded the limit at the 70,000 lb/day. It appears that how to operate the scrubber (i.e., pressure change) affects the dryer and pre-dryer emissions at the same time. Therefore, when a source test is required, we may consider source testing both emissions points at approximate the same time, such as in two consecutive days.

Permit Condition 9.2 – 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.

MRRR - (Permit Conditions 3.7 through 3.9)

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

<u>Plant Space Heaters (Air Makeup Units)</u>

Permit Condition 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.

MRRR – (Permit Condition 10.2)

In order to 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). 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.

Emergency Engine

MRRR (Permit Conditions 11.1 through 11.13)

Requirements applicable to the emergency RICE to demonstrate compliance with 40 CFR ZZZZ are summarized.

6.3 General Provisions

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

General Compliance, Duty to Comply

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

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

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

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

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

General Compliance, Duty to Supplement or Correct Application

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

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

Reopening, Additional Requirements, Material Mistakes, Etc.

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

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

Reopening, Permitting Actions

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

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

Property Rights

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

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

Information Requests

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

[Idaho Code §39-108; IDAPA 58.01.01.122, 4/5/2000; IDAPA 58.01.01.322.15.f, 4/5/2000; 40 CFR 70.6(a)(6)(v)]

Information Requests, Confidential Business Information

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

[IDAPA 58.01.01.322.15.g, 5/1/1994; IDAPA 58.01.01.128, 4/5/2000; 40 CFR 70.6(a)(6)(v)]

Severability

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

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

Changes Requiring Permit Revision or Notice

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

[IDAPA 58.01.01.200-223, 4/2/2008; 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), and 70.7(d), (e)]

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

[IDAPA 58.01.01.381-385, 7/1/2002; IDAPA 58.01.01.209.05, 4/11/2006; 40 CFR 70.4(b)(14) and (15)]

Federal and State Enforceability

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

[IDAPA 58.01.01.322.15.j, 5/1/1994; IDAPA 58.01.01.322.15.k, 3/23/1998; Idaho Code §39-108; 40 CFR 70.6(b)(1), (2)]

Inspection and Entry

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

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

[Idaho Code §39-108; IDAPA 58.01.01.322.15.l, 5/1/1994; 40 CFR 70.6(c)(2)]

New Applicable Requirements

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

[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.10.a.ii, 5/1/1994; 40 CFR 70.6(c)(3) citing 70.5(c)(8)]

Fees

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

[IDAPA 58.01.01.387, 4/2/2003; 40 CFR 70.6(a)(7)]

Certification

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

[IDAPA 58.01.01.322.15.o, 5/1/1994; 40 CFR 70.6(a)(3)(iii)(A); 40 CFR 70.5(d)]

Renewal

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

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

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

[IDAPA 58.01.01.322.15.p, 5/1/1994; 40 CFR 70.7(b)]

Permit Shield

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

- Such applicable requirements are included and are specifically identified in the Tier I operating permit; or
    - DEQ has determined that other requirements specifically identified are not applicable and all of the criteria set forth in IDAPA 58.01.01.325.01(b) have been met.

- The permit shield shall apply to permit revisions made in accordance with IDAPA 58.01.01.381.04 (administrative amendments incorporating the terms of a permit to construct), IDAPA 58.01.01.382.04 (significant modifications), and IDAPA 58.01.01.384.03 (trading under an emissions cap).
- Nothing in this permit shall alter or affect the following:
  - Any administrative authority or judicial remedy available to prevent or terminate emergencies or imminent and substantial dangers;
  - The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
  - The applicable requirements of the acid rain program, consistent with 42 U.S.C. Section 7651(g)(a); and
  - The ability of EPA to obtain information from a source pursuant to Section 114 of the CAA; or the ability of DEQ to obtain information from a source pursuant to Idaho Code §39-108 and IDAPA 58.01.01.122.

[Idaho Code §39-108 and 112; IDAPA 58.01.01.122, 4/5/2000; IDAPA 58.01.01.322.15.m, 325.01, 5/1/1994; IDAPA 58.01.01.325.02, 3/19/1999; IDAPA 58.01.01.381.04, 382.04, 383.05, 384.03, 385.03, 3/19/99; 40 CFR 70.6(f)]

Compliance Schedule and Progress Reports

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

[IDAPA 58.01.01.322.10, 4/5/2000; 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

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

- Compliance certifications for all emissions units shall be submitted annually unless otherwise specified; and
- 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

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

[IDAPA 58.01.01.125, 3/23/1998]

No Tampering

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

[IDAPA 58.01.01.126, 3/23/1998]

Semiannual Monitoring Reports.

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

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

Reporting Deviations and Excess Emissions

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

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

[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, Emissions Trading

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

[IDAPA 58.01.01.322.05.b, 4/5/2000; 40 CFR 70.6(a)(8)]

Emergency

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

[IDAPA 58.01.01.332.01, 4/5/2000; 40 CFR 70.6(g)]

7. REGULATORY REVIEW

7.1 Attainment Designation (40 CFR 81.313)

The facility is located in Bingham County which is designated as attainment or unclassifiable for $PM_{10,}$ $PM_{2.5}$, CO, NO_2, SO_x, and Ozone. Reference 40 CFR 81.313.

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

Post project facility-wide emissions from this facility have a potential to emit greater then 100 tons per year for $PM_{2.5}/PM_{10}$, NO_x, and CO as demonstrated in the Emissions Inventories section of this analysis. Therefore, this facility is classified as a major facility as defined in IDAPA 58.01.01.008.10.

7.3 PSD Classification (40 CFR 52.21)

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

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

7.4 NSPS Applicability (40 CFR 60)

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

Boiler 2A is subject to this subpart. Boiler 2A only combusts natural gas as fuel. Therefore, the only sections of this subpart that are applicable to the boiler are the Applicability and Delegation of Authority specified in 40 CFR 60.40c(a), the Recordkeeping requirements of 40 CFR 60.48c(g)(1)-(3), (i) and the Reporting requirements of 40 CFR 60.48c(a), (j).

7.5 NESHAP Applicability (40 CFR 61)

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

7.6 MACT Applicability (40 CFR 63)

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

The BAF Blackfoot Facility has a 201 HP-rated propane fired gas engine that provides emergency backup power for one of the plant water supply wells. The engine was installed in 1962. It is typically operated approximately once/month for a short time. The engine has a non-resettable hours meter.

In accordance with 40 CFR 63.6595(a)(1), because the facility has an existing stationary SI RICE located at an area source of HAP emissions, the facility must comply with the applicable emission limitations and operating limitations no later than October 19, 2013.

In accordance with 40 CFR 63.6605(a), (b) the facility must meet the applicable General Compliance Requirements:

§63.6605(a) You must be in compliance with the emission limitations, operating limitations, and other requirements in this subpart that apply to you at all times.

§63.6605 (b) At all times you 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 you 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.

In accordance with 40 CFR 63.6625(e), (h), (j).

In accordance with 40 CFR 63.6595(a)(1), because the facility operates an affected source, the facility must meet the applicable notification requirements in §63.6645 and in 40 CFR part 63, subpart A.

In accordance with 40 CFR 63.6603(a), the facility must comply with the requirements in Table 2d to this subpart and the operating limitations in Table 2b to this subpart that apply to the generator.

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

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

b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first; amd

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

In accordance with 40 CFR 63.6605(b), at all times, the facility 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 facility 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 63.6625:

(e) If you own or operate any of the following stationary RICE, you must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own 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.

(3) An existing emergency or black start stationary RICE located at an area source of HAP emissions;

40 CFR 63.6625:

(h) If you operate a new, reconstructed, or existing stationary engine, you 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 Tables 1a, 2a, 2c, and 2d to this subpart apply.

In accordance with 40 CFR 63 Subpart ZZZZ Table 6, the permittee shall demonstrate continuous compliance by:

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

ii. Develop and follow your own 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.

From 40 CFR 63.6640:

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

(1) There is no time limit on the use of emergency stationary RICE in emergency situations.

(2) You may operate your emergency stationary RICE for any combination of the purposes specified in paragraphs (f)(2)(i) through (iii) of this section for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by paragraphs (f)(3) and (4) of this section counts as part of the 100 hours per calendar year allowed by this paragraph (f)(2).

(i) Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.

(ii) Emergency stationary RICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see § 63.14), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.

The above paragraph is not applicable.

(iii) Emergency stationary RICE may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.

(3) Emergency stationary RICE located at major 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 paragraph (f)(2) of this section. 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 supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(4) 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 paragraph (f)(2) of this section. Except as provided in paragraphs (f)(4)(i) and (ii) of this section, 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.

(i) Prior to May 3, 2014, the 50 hours per year for non-emergency situations can be used for peak shaving or non-emergency demand response to generate income for a facility, or to otherwise supply power as part of a financial arrangement with another entity if the engine is operated as part of a peak shaving (load management program) with the local distribution system operator and the power is provided only to the facility itself or to support the local distribution system.

(ii) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met:

(A) The engine is dispatched by the local balancing authority or local transmission and distribution system operator.

(B) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region.

(C) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines.

(D) The power is provided only to the facility itself or to support the local transmission and distribution system.

(E) The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.

The compliance report referred to in 40 CFR63.6650 is a requirement of Table 7. This does not apply to emergency engines.

From 40 CFR 63.6650(f): *Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 or 71 must report all deviations as defined in 40 CFR 63 Subpart ZZZZ in the semiannual monitoring report required by 40 CFR 70.6 (a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A).*

From 40 CFR 6650(h): *If you own or operate an emergency stationary RICE with a site rating of more than 100 brake HP that operates or is contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in § 63.6640(f)(2)(ii) and (iii) or that operates for the purpose specified in § 63.6640(f)(4)(ii), you must submit an annual report according to the requirements in paragraphs (h)(1) through (3) of this section.*

(1) The report must contain the following information:

(i) Company name and address where the engine is located.

(ii) Date of the report and beginning and ending dates of the reporting period.

(iii) Engine site rating and model year.

(iv) Latitude and longitude of the engine in decimal degrees reported to the fifth decimal place.

(v) Hours operated for the purposes specified in § 63.6640(f)(2)(ii) and (iii), including the date, start time, and end time for engine operation for the purposes specified in § 63.6640(f)(2)(ii) and (iii).

(vi) Number of hours the engine is contractually obligated to be available for the purposes specified in § 63.6640(f)(2)(ii) and (iii).

(vii) Hours spent for operation for the purpose specified in § 63.6640(f)(4)(ii), including the date, start time, and end time for engine operation for the purposes specified in § 63.6640(f)(4)(ii). The report must also identify the entity that dispatched the engine and the situation that necessitated the dispatch of the engine.

(viii) If there were no deviations from the fuel requirements in § 63.6604 that apply to the engine (if any), a statement that there were no deviations from the fuel requirements during the reporting period.

(ix) If there were deviations from the fuel requirements in § 63.6604 that apply to the engine (if any), information on the number, duration, and cause of deviations, and the corrective action taken.

(2) The first annual report must cover the calendar year 2015 and must be submitted no later than March 31, 2016. Subsequent annual reports for each calendar year must be submitted no later than March 31 of the following calendar year.

(3) The annual report must be submitted electronically using the subpart specific reporting form in the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the written report must be submitted to the Administrator at the appropriate address listed in § 63.13.

From 40 CFR 63.6655:

(d) You must keep the records required in Table 6 of this subpart to show continuous compliance with each emission or operating limitation that applies to you.

There are no emission or operating limits specified in Table 6 for the engine. There are work or management practices, but this subpart specifically states, "emisson or operating limitation."

(e) You must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according to your own maintenance plan if you own or operate any of the following stationary RICE;

(1) An existing stationary RICE with a site rating of less than 100 brake HP located at a major source of HAP emissions.

(2) An existing stationary emergency RICE.

(3) An existing stationary RICE located at an area source of HAP emissions subject to management practices as shown in Table 2d to this subpart.

Parts (2) and (3) apply, so this recordkeeping requirement applies.

From 40 CFR 63.6655:

(f) If you own or operate any of the stationary RICE in paragraphs (f)(1) through (2) of this section, you 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 § 63.6640(f)(2)(ii) or (iii) or § 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.

(1) An existing emergency stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions that does not meet the standards applicable to non-emergency engines.

(2) An existing emergency stationary RICE located at an area source of HAP emissions that does not meet the standards applicable to non-emergency engines.

Part (f)(2) applies.

40 CFR 63 Subpart ZZZZ Table 8 identifies the general provisions that apply to RICE that are subject to 40 CFR Subpart ZZZZ in general. Because this table addresses the general provisions that apply to RICE in general, some parts will apply to the RICE permitted by this permit, and some parts will not apply.

40 CFR 63 Subpart JJJJJJ..... National Emissions Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources

§ 63.11193 Am I subject to this subpart?

You are subject to this subpart if you own or operate an industrial, commercial, or institutional boiler as defined in § 63.11237 that is located at, or is part of, an area source of hazardous air pollutants (HAP), as defined in § 63.2, except as specified in § 63.11195.

The facility has one applicable boiler, so the facility is subject to 40 CFR 63 Subpart JJJJJJ if it burns distillate fuel oil.

§ 63.11194 What is the affected source of this subpart?

(a) This subpart applies to each new, reconstructed, or existing affected source as defined in paragraphs (a)(1) and (2) of this section.

(1) The affected source is the collection of all existing industrial, commercial, and institutional boilers within a subcategory (coal, biomass, oil), as listed in § 63.11200 and defined in § 63.11237, located at an area source.

(2) The affected source of this subpart is each new or reconstructed industrial, commercial, or institutional boiler within a subcategory, as listed in § 63.11200 and as defined in § 63.11237, located at an area source.

(b) An affected source is an existing source if you commenced construction or reconstruction of the affected source on or before June 4, 2010.

Boiler 3 was installed prior to June 4, 2010. Boiler 3 can burn distillate fuel oil as well as natural gas. The following is the definition of the oil subcategory in accordance with 40 CFR 63.11237:

Oil subcategory includes any boiler that burns any liquid fuel and is not in either the biomass or coal subcategories. Gas-fired boilers that burn liquid fuel only during periods of gas curtailment, gas supply interruptions, startups, or for periodic testing are not included in this definition. Periodic testing on liquid fuel shall not exceed a combined total of 48 hours during any calendar year.

From 40 CFR 63.11195:

The types of boilers listed in paragraphs (a) through (k) of this section are not subject to this subpart and to any requirements in this subpart.

…

(e) A gas-fired boiler as defined in this subpart.

From 40 CFR 63.11237:

Gas-fired boiler includes any boiler that burns gaseous fuels not combined with any solid fuels and burns liquid 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.

Boiler 3 currently meets the definition of a gas-fired boiler and is not currently subject to Subpart JJJJJJ. If BAF decides in the future to burn non-gas fuel, the following rule applies:

40 CFR 63.11210(h) For affected boilers that switch fuels or make a physical change to the boiler that results in the applicability of a different subcategory within subpart JJJJJJ or the boiler becoming subject to subpart JJJJJJ, you must demonstrate compliance within 180 days of the effective date of the fuel switch or the physical change. Notification of such changes must be submitted according to § 63.11225(g).

Applicable requirements can be addressed at such future time as BAF elects to switch fuels and become subject to the rule.

Because the current permits allow the use of distillate fuel oil, a permit condition was written to require a permit change that shall include applicable provisions of 40 CFR63 Subpart JJJJJJ if distillate fuel oil is used in the Boiler 3.

7.7 CAM Applicability (40 CFR 64)

§64.2 Applicability.

(a) General applicability. Except for backup utility units that are exempt under paragraph (b)(2) of this section, the requirements of this part shall apply to a pollutant-specific emissions unit at a major source that is required to obtain a part 70 or 71 permit if the unit satisfies all of the following criteria:

(1) The unit is subject to an emission limitation or standard for the applicable regulated air pollutant (or a surrogate thereof), other than an emission limitation or standard that is exempt under paragraph (b)(1) of this section;

(2) The unit uses a control device to achieve compliance with any such emission limitation or standard; and

(3) The unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source. For purposes of this paragraph, "potential pre-control device emissions" shall have the same meaning as "potential to emit," as defined in §64.1, except that emission reductions achieved by the applicable control device shall not be taken into account.

CAM does not apply as was addressed in the Statement of Basis for T1-060315, dated November 5, 2007:

"*…Boiler 3 is not applicable to CAM for amy pollutant since it does not use a control device to achieve compliance with emission limits or standards….*".

CAM does not apply to Boiler 2A since it does not use a control device to achieve compliance with emission limits or standards.

7.8 Acid Rain Permit (40 CFR 72-75)

The facility is not subject to the acid rain permit requirements.

8. PUBLIC COMMENT

This permitting action is a Tier I administrative permit amendment to incorporate a PTC issued in accordance with IDAPA 25.01.01.209.05.c. A public comment period is not required in accordance with IDAPA 58.01.01.381.

9. EPA REVIEW OF PROPOSED PERMIT

This permitting action is a Tier I administrative permit amendment to incorporate a PTC issued in accordance with IDAPA 25.01.01.209.05.c. The EPA 45-day review is not required in accordance with IDAPA 58.01.01.381.