March 24, 2000

MEMORANDUM

TO: Audrey Cole, Administrator
Pocatello Regional Office

FROM: Ken Hanna, Air Quality Engineer
Mary Walsh, Meteorologist
State Technical Services Program Office

SUBJECT: ***PERMIT TO CONSTRUCT TECHNICAL ANALYSIS***
P-000306, Simplot, Aberdeen
(Line 1 Dryer Replacement, PTC No. 011-00029)

PURPOSE

The purpose for this memorandum is to satisfy the requirements of IDAPA 16.01.01.200 (*Rules for the Control of Air Pollution in Idaho*) for issuing Permits to Construct (PTC).

PROJECT DESCRIPTION

The J.R. Simplot Company (Simplot) has submitted an application for a 15-day Pre-permit Construction Approval and a Permit to Construct (PTC) for a replacement of the Line 1 Dryer at the Aberdeen Plant.

SUMMARY OF EVENTS

On March 9, 2000, the Division of Environmental Quality (DEQ) received a PTC Application from Simplot for the dryer replacement project.

DISCUSSION

1. Process Description

   A detailed description of the Line 1 Dryer and the overview of the Idaho Potato Processing Facility was provided in the application, and a copy is included in Appendix A for convenient reference. As noted in the application, this dryer replacement is not projected to increase emissions. The combustion capacity of the old and new dryers will remain the same, and the new dryer will incorporate low-NOx burners so a decrease in NOx emissions is expected to occur. The existing dryer operates using 8 burners rated at 2.5 MMBtu/hr each to remove surface moisture from the potato strips prior to frying. The replacement dryer would operate using four new low-NOx burners rated at 5 MMBtu/hr each.

2. Area Classification

   This facility is located in Aberdeen, Idaho which is located in Bingham County. The area is designated as an attainment or unclassifiable area for all regulated criteria air pollutants. Bingham County is located in AQCR 61 and Zone 12.

3. Facility Classification

   This facility is not a major facility as defined in IDAPA 16.01.01.006.55, and the proposed project does not represent an increase in the aggregated emissions of all units at the facility as a whole since it only involves the replacement of one dryer with another similar unit. Estimated emissions of all pollutants will remain

unchanged by this project with the exception of NOx which will be reduced. This facility is not a designated facility as defined in IDAPA 16.01.01.006.27. The proposed dryer at this facility is not subject to federal New Source Performance Standards (NSPS) or National Emission Standards for Hazardous Air Pollutants (NESHAPS) regulation. The the primary SIC code for the facility is 2099, and the AIRS facility classification for this facility is "A2" because the uncontrolled potential to emit is greater than 100 T/yr.

4. Emission Estimates

Emissions associated with combustion for this project were estimated by the applicant using AP-42 emission factors for the natural gas combustion. An emission factor of 0.066 pounds of PM-10 per 1000 pounds of finished saleable product was used for PM-10 from the dryer stacks (based on source test data on a similar unit, Caldwell Line 6 dryer, plus a 20% safety factor). Hourly emissions are based on a finished saleable product rate of 32,000 lb/hr and 200,000,000 lb/yr. It is important to note that throughput, with respect to the Line 1 Dryer, is measured as the amount of finished product produced in the production line (i.e., a measurement of product output, not input). These production rates are the same for both the dryer being replaced and the new dryer to be installed - there is no change in actual production rate proposed as part of this project. The emission estimates provided in the PTC application were reviewed and found to be consistent with DEQ methods. The estimated emissions and estimated emissions plus 25% (determined for permitting purposes to provide some degree of flexibility within required levels) are presented in the table below. In addition, a copy of the facility's emission estimates is included in Appendix A for convenient reference.

Source Description	PM-10		NO_x		CO		VOC		SO2	
	lb/h	T/y	lb/h	T/y	lb/h	T/y	lb/h	T/y	lb/h	T/y
Line 1 Dryer Estimated Emissions	2.1	6.6	0.95	4.2	1.6	7.0	0.11	0.46	0.01	0.05
Line 1 Dryer Estimated Emissions + 25%	2.6	8.3	1.2	5.2	2.0	8.8	0.13	0.58	0.01	0.06

5. Modeling

As part of the 15-day Pre-Permit Construction Approval request, detailed air dispersion modeling was provided in the application. To verify that the permit emission limits would not result in an exceedance of the NAAQS, the modeled maximum concentrations were also increased by 25 percent. This also showed compliance with all of the applicable air quality standards. Thus it was determined that the facility's Line 1 Dryer stack emissions would not cause, or significantly contribute to, an exceedance of any National Ambient Air Quality Standards (NAAQS) or any of the Idaho Toxic Air Pollutant (TAP) limits at or beyond the property boundary. Copies of Tables 7.3 and 7.4 from the application which summarize the modeled concentrations of emissions from the new dryer are included in Appendix B.

6. Regulatory Review

6.1 IDAPA 16.01.01.577 Ambient Air Quality Standards for Specific Air Pollutants

As described above in the air dispersion modeling section of this Memorandum, the proposed modification would not cause or significantly contribute to a violation of any ambient air quality standard.

6.2 Prevention of Significant Deterioration

The J.R. Simplot Aberdeen Processing Facility is not a major facility, and this PTC request does not constitute a major modification with regard to PSD. Therefore, PSD requirements do not apply to this PTC.

6.3 New Source Performance Standards 40 CFR 60

NSPS requirements do not apply.

6.4 National Emission Standards for Hazardous Air Pollutants 40 CFR 610

NESHAPs requirements do not apply to this facility.

6.5 Maximum Achievable Control Technology Standards 40 CFR 63

MACT requirements do not apply to this facility.

7. Permit Requirements

7.1 Emission Limits

As discussed with the facility, emission limits have been established based on the estimated emissions plus 25 percent. At this level, the facility will remain within required levels (e.g. NAAQS limits and minor source status will not be exceeded) and yet still retain some degree of operational flexibility. Emission limits for VOC and SO_2 were not placed in the Permit since the short and long term emission rates from the Line 1 Dryer are inherently limited by this unit's maximum throughput capacity to be well below levels of regulatory concern.

7.2 Operating Requirements

7.2.1 Throughput Limit

The maximum throughput of potato product to the Line 1 dryer has been limited to two hundred and fifty million pounds per any consecutive 12 month period (250,000,000 lb/yr). Consistent with the PTC issued on June 8, 1999 for the Line 1 Fryers, limitations of the total potato product processed is the primary basis of regulating PM-10 from this source.

7.3 Monitoring and Recordkeeping Requirements

7.3.1 Throughput Monitoring

Potato product throughput monitoring for the Line 1 Dryer is required, consistent with EPA methods, to demonstrate that the permit throughput limit is not exceeded.

8. Permit Coordination

Copies of the draft permit and technical analysis were made available for review to the Boise Regional Office prior to issuance. Also, this facility is not a major facility as defined by IDAPA 16.01.01.006.55 and IDAPA 16.01.01.008.10., it is not an NSPS-affected facility, and the NESHAP/MACT requirements of 40 CFR Parts 60-63 do not apply. Therefore, coordination with the Operating Permit Section is not necessary.

9. AIRS

Changes to the AIRS database are included in Appendix C of this Memorandum.

10. FEES

The J.R.Simplot Aberdeen Facility is not a major facility as defined in IDAPA 16.01.01.008.10. Therefore, registration fees are not applicable in accordance with IDAPA 16.01.01.527.

RECOMMENDATION

Based on review of application materials and all applicable state and federal rules and regulations, staff recommends that the J.R. Simplot Company be issued PTC No. 011-00029 for the Aberdeen Plant Line 1 Dryer Replacement project. No public comment period is recommended, no entity has requested a comment period, and the project does not involve PSD requirements.

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cc: DEQ State Office
EPA Region 10
Source File (011-00029)

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3. Facility Classification

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4. Emission Estimates

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Source Description	PM-10		NO_x		CO		VOC		SO2	
	lb/h	T/y	lb/h	T/y	lb/h	T/y	lb/h	T/y	lb/h	T/y
Line 1 Dryer Estimated Emissions	2.1	6.6	0.95	4.2	1.6	7.0	0.11	0.46	0.01	0.05
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5. Modeling

As part of the 15-day Pre-Permit Construction Approval request, detailed air dispersion modeling was provided in the application. To verify that the permit emission limits would no

Appendix A

Project Description and Emission Estimates

P-000306
J.R. Simplot Company, Aberdeen

Line 1 Dryer Process Replacement Description

The general description for the Aberdeen Processing Facility follows this description. Changes related to this Permit to Construct application and 15-day Pre-Permit Construction Approval application are described below.

The existing Line 1 dryer (Proctor and Schwartz, Model S.C.F. 2 stage dryer) consist of a multistage chamber system where 8 Maxon Oven-Pak duct burners, rated at 2.5 MM Btu/hr each, are arranged through out the dryer. Fuel for the burners is natural gas. Potato strips from the blanching system enters one end of the dryer through a conveyor and is transported through the dryer. The drying operation removes surface moisture and some bound moisture within the potatoes, only a small part of the moisture of the potato is removed. Outside ambient air is the source for combustion as well as excess air to transport the moisture out of the dryer chambers. There is one stack above the roof that exhausts the dryer emissions. The existing dryer system has been in place since before 1970. Due to deteriorating conditions within the superstructure of the dryer, the existing dryer is being replaced by another dryer.

The replacement dryer is a National Drying Machinery (National), Model T.D.S. 2 stage conveyor dryer. This dryer was previously located at a potato processing facility at Grand Rapids, Michigan, where it operated similarly to the Aberdeen process. The original burners on the dryer will not be used, four new Eclipse Winnox Burners, Model WX500, rated at 5 MM Btu/hr each will be used. This dryer has four heat recovery units located on the roof, one for each stack from the dryer. The heat recovery unit, on one side of the exchanger, takes outside ambient air and is heat exchanged with the exhaust from the dryer, on the other side of the exchanger. The heated ambient air is discharged as make-up air to the dryer, while the cooler exhaust air is discharged to ambient above the roofline.

General Facility Description
Aberdeen, Idaho Potato Processing Facility

Site Description

The J. R. Simplot Plant facility is located within the city limits of Aberdeen in Bingham County, about one-half mile west of downtown Aberdeen. The overall terrain is a flat basin. Simplot produces preformed parfried potatoes and french fried parfried potatoes. The french fries are produced from raw potatoes and the preformed products are made from segregated french fries, small potatoes and potato pieces.

Process Descriptions

The facility consists of one main building where the potato processing is carried out. Some other ancillary buildings include the boiler room, frozen product storage and wastewater treatment systems.

Potato Processing Plant: Potato production generally consists of the following major steps:

Receiving and unloading of raw potatoes
Sorting and seasonal inspection
Cleaning and peeling
Cutting and culling of potato pieces
Blanching (potatoes are dipped in hot water)
Drying
Frying
Freezing
Packaging
Product storage and shipping

Raw potatoes are delivered to the facility by trucks and unloaded into the storage buildings and receiving area. Unloading of potato trucks are conducted within the generalized area of the storage buildings and receiving area. Inside the receiving area potatoes are pushed from the storage piles into a water flume system that is used to wash and transport the potatoes. The potatoes are first mechanically sorted by size and, during harvest time, the potatoes are also randomly inspected by the Idaho Department of Agriculture. Sorting and inspection do not result in air emissions because the potatoes handled are wet and transported by flumes.

The potatoes are transported by flume to the two production lines at the plant. Potato peels are removed in the steam peelers at the front of the production lines. The potatoes are then transported, by flume, to the cutting decks where the potatoes are sliced into various shapes and lengths.

After the potatoes are cut into different lengths, they are dipped into hot water blancher tanks to remove the excess sugars. The potato products are then conveyed to the dryers to remove surface moisture. Each dryer is typically one large unit that is divided into two or three zones using internal baffles; each zone is heated with natural gas fired burners. Once the surface moisture is removed the potatoes are place in fryers. Hot cooking oil is used to partially cook (parfry) the products before they are frozen. Steam heat exchangers are utilized to supply the heat to the oil within the fryers. A typical fryer system includes the fryer, an oil mixer, and an oil filter. The fryer systems within the plant are vented to spray scrubbers to reduce oil emissions. After the potato products are fried, the final product is frozen and packed for storage and shipping.

The facility has two processing lines. Line 1 is used primarily to process the french fries. Line 2 is used primarily to process preformed fries.

To maintain a consistent indoor temperature of 65 deg. F to 70 deg. F from receiving to packaging, heating units are used during the cold season. Natural gas fired space-heating units are placed within the facility to provide required heat.

The steam-generating plant is located next to the main processing plant and consists of two boilers that provide steam primarily to the peelers, blanchers and fryers.

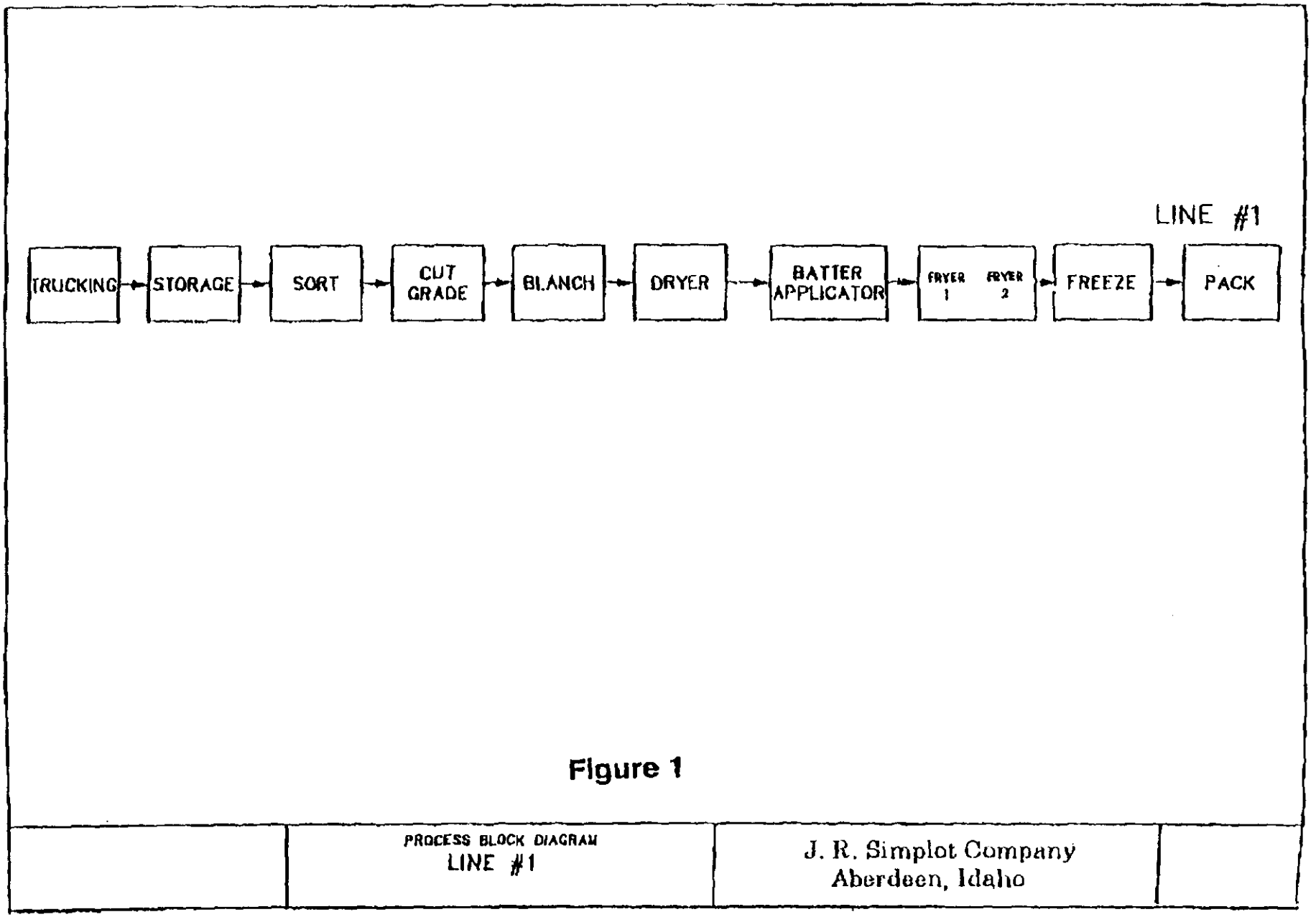

Figure 1

	PROCESS BLOCK DIAGRAM LINE #1	J. R. Simplot Company Aberdeen, Idaho	

Section 4 - Contents

Table 4-1. Estimated Emissions
Table 4-2. Toxic air pollutant emission factors and rates related to natural gas combustion
Table 4-3. Facility-wide Emission Inventory – March, 2000

A summary of emissions for the new dryer is given in Table 4-1.

IDAPA 16.01.01.585 and .586 identify screening emission levels (EL) and acceptable ambient concentrations (AAC) for non-carcinogenic and carcinogenic toxic air pollutants, respectively. Table 4-2 identifies emission rates of pollutants related to the combustion of natural gas in the replacement dryer that are addressed by Idaho toxic air pollutant regulations. If the anticipated emission rate of a toxic air pollutant is less than the screening emission limit, then an ambient assessment is not required.

Table 4-2 indicates emissions of most products of combustion that are considered toxic air pollutants are less than the screening emission level. An ambient impact analysis of those pollutants is not required. However, emissions of formaldehyde, arsenic, cadmium, and nickel exceed the corresponding screening emission levels. Consequently, these pollutants were evaluated using an EPA dispersion model. As discussed in Section 7, the calculated maximum ambient concentrations of all these pollutants were found to be less than the Acceptable Ambient Concentrations cited in IDAPA 16.01.01.586.

An overall emission inventory of the Aberdeen Plant facility is given in Table 4-3. Table 4-3 also shows the emissions from the existing dryer. Since AP-42 emission factors were used for the combustion of natural gas and there is no net increase or decrease in rated burner capacity, the emission are unchanged for CO, VOC and SOx. The emission for NOx will be lower for the new dryer because the Eclipse burners are considered "low-NOx" burners. The PM10 emissions remain the same, since an emission factor from another similar unit was used and the throughput of potatoes has not changed from the old dryer.

Table 4-1.

Aberdeen Dryer Replacement Project, 2000

Estimated Emissions

National Dryer, Model T.D.S. 2 stage convery dryer
Eclipse Winnox Burners, (4) - each rated at 5 MM Btu/hr

	Rated Capacity		Emission Factor		Emissions lb/hr	notes	tons/yr	notes
Particulates (as PM10)	200 32,000	MM Lb/yr Lb/hr	0.066	Lb/M Lb	2.112	(1)	6.60	(2)
Sulfur dioxide	20	MMBtu/hr	0.6	lb/MMscf	0.011	(3)	0.05	(3)
Carbon monoxide	20	MMBtu/hr	84	lb/MMscf	1.600	(4)	7.01	(4)
Nitrogen oxides	20	MMBtu/hr	50	lb/MMscf	0.952	(4)	4.17	(4)
Volatile organic compounds	20	MMBtu/hr	5.5	lb/MMscf	0.105	(3)	0.46	(3)

Notes:

(1) Emission factor based on 0.066 lbs of PM10 per 1000 lbs of finished saleable product, based on source test on a similar unit, Caldwell Line 6 dryer (source test available), plus 20 % safety factor
Hourly emissions based on finished saleable product rate of 32,000 Lb per hour

(2) Emission factor based on 0.066 lbs of PM10 per 1000 lbs of finished saleable product, based on source test on a similar unit, Caldwell Line 6 dryer (source test available), plus 20 % safety factor
Yearly emissions based on finished saleable product rate of 200,000,000 Lb/yr, annual capacity

(3) Emission factor based on EPA AP-42, 1.4 Natural Gas Combustion (3/1998 edition), Table 1.4-2.

(4) Emission factor based on EPA AP-42, 1.4 Natural Gas Combustion (3/1998 edition), Table 1.4-1., small boilers, Controlled - Low Nox burners

The emissions above are the combined emissions for all four stacks

e.g. NO_x = $\left(\frac{20\ MM\ Btu}{hr}\right)\left(\frac{Sc\ F}{1020\ Btu}\right)\left(\frac{50\ lb}{mm\ Sc\ F}\right) = 0.98\ \frac{lb}{hr}$

PM-10 $\left(\frac{0.066\ lb}{1000\ lb}\right)\left(\frac{32,000\ lb}{hr}\right) = 2.11\ \frac{lb}{hr}$

Table 4-2. Toxic air pollutant emission factors and rates related to natural gas combustion

CAS No.	Compound	Emission Factor (lb/MMscf)	Emission Rate (lb/hr)	IDAPA Screening Emission Limit (lb/hr)	Over Screening Emission Limit? (yes or no)
71-43-2	Benzene	2.1E-03	0.00004	0.0008	no
50-00-0	Formaldehyde	7.5E-02	0.00143 ✓	0.00051 ✓	yes
110-54-3	Hexane	1.8E+00	0.03	12.00	no
91-20-3	Naphthalene	6.1E-04	0.00001	3.33	no
109-66-0	Pentane	2.6E+00	0.05	118	no
108-88-3	Toluene	3.4E-03	0.0001	25	no
7440-38-2	Arsenic	2.0E-04	0.0000038 ✓	0.0000015 ✓	yes
7440-39-3	Barium	4.4E-03	0.00008	0.033	no
7440-41-9	Cadmium	1.1E-03	0.0000210 ✓	0.0000037 ✓	yes
7440-47-3	Chromium	1.4E-03	0.00003	0.033	no
7440-48-4	Cobalt	8.4E-05	0.000002	0.0033	no
7440-50-8	Copper	8.5E-04	0.00002	0.013	no
7439-96-5	Manganese	3.8E-04	0.00001	0.067	no
7439-97-6	Mercury	2.6E-04	0.000005	0.001	no
7439-98-7	Molybdenum	1.1E-03	0.00002	0.333	no
7440-02-0	Nickel	2.1E-03	0.000040 ✓	0.000027 ✓	yes
7440-66-6	Zinc	2.9E-02	0.001	0.667	no

Notes:

Some of the compounds addressed in Draft AP-42 Section 1.4 were investigated in source tests but were not present in concentrations above the testing detection limits. These compounds have not been included in this assessment.

Reference: *Emission Factor Documentation for AP-42 Section 1.4 Natural Gas Combustion*. USEPA, Research Triangle Park, NC, July 1998.

e.g. Benzene = $\left(\frac{20\ mmBtu}{hr}\right)\left(\frac{2.1E\text{-}3\ lb}{MM\ Scf}\right)\left(\frac{Scf}{1020\ Btu}\right) = 4.12E\text{-}5 = 0.000041\ \frac{lb}{hr}$

Table 4-3.

J. R. Simplot, Aberdeen Plant, Idaho

Facility-wide Emission Inventory - March, 2000

Emission Unit	Rated Capacity		PM10 Emission Factor		Emission tons/yr	Nox Emission Factor		Emission tons/yr	CO Emission Factor		Emission tons/yr	VOC Emission Factor		Emission tons/yr	SO2 Emission Factor		Emission tons/yr
Boilers	35.037	MMBtu/hr	7.6	Lb/MMscf	1.11	100	Lb/MMscf	14.62	84	Lb/MMscf	12.28	5.5	Lb/MMscf	0.80	0.6	Lb/MMscf	0.09
	35.037	MMBtu/hr	7.6	Lb/MMscf	1.11	100	Lb/MMscf	14.62	84	Lb/MMscf	12.28	5.5	Lb/MMscf	0.80	0.6	Lb/MMscf	0.09
Line 1	20	MMBtu/hr				50	Lb/MMscf	4.17	84	Lb/MMscf	7.01	5.5	Lb/MMscf	0.46	0.6	Lb/MMscf	0.05
Dryer (new)	200	MM Lb/yr	0.066	Lb/M Lb	6.6												
Line 1	20	MMBtu/hr				100	Lb/MMscf	8.34	84	Lb/MMscf	7.01	5.5	Lb/MMscf	0.46	0.6	Lb/MMscf	0.05
Dryer (old)	200	MM Lb/yr	0.066	Lb/M Lb	6.6												
Area Heaters	83	MMBtu/hr	7.6	Lb/MMscf	2.63	100	Lb/MMscf	34.62	84	Lb/MMscf	29.08	5.5	Lb/MMscf	1.90	0.6	Lb/MMscf	0.21
Line 1 Fryer	200	MM Lb/yr	PTC, 6/8/99		39.11							PTC application, 6/98		82			
Line 2 Fryer	61.32	MM Lb/yr	0.72	Lb/M Lb	22.08							0.468	Lb/M Lb	14.35			
Gasoline Tank-loading	48,000	gallons/yr throughput										23.2	Lb/M Lb	0.56			
Gasoline Tank-breath	4,000	gallon tank										588	lb/year	0.29			
Printing Operations	5.2	gallons ink										6.78	lb/gallon	0.02			
Emission Totals					79.24			76.37			67.65			81.65			0.48

Notes: The Line 1 Dryer (old) will be removed prior to installation of the Line 1 Dryer (new)

Appendix B

Air Dispersion Modeling Information

P-000306
J.R. Simplot Company, Aberdeen

Table 7-3. Comparison of maximum criteria pollutant predictions with ambient standards

Criteria Pollutant	Averaging Time	Maximum Concentration [a] ($\mu g/m^3$)	Background Concentration [b] ($\mu g/m^3$)	Total Concentration ($\mu g/m^3$)	NAAQS/ IAAQS ($\mu g/m^3$)
NO_2	Annual	3	40	43	100
SO_2	3 hour	0.38	543	543	1,300
	24 hour	0.17	144	144	262
	Annual	0.03	24	24	52
CO	1 hour	60	11,450	11,510	40,000
	8 hour	42	5,153	5,194	10,000
PM10	24 hour	32	102	134	150
	Annual	5	21	26	50

[a] Maximum concentration predicted by ISCST3 using a screening meteorological data set and conservative persistence factors. Hourly concentrations are converted to 3-hour, 8-hour, 24-hour and annual averaging times using persistence factors of 0.9, 0.7, 0.4, 0.08, respectively.

[b] Background concentrations are as follows:

SO_2, NO_2, & CO: Statewide background values recommended by IDEQ based on historical monitoring data throughout Idaho and discussions with other state agencies.

PM10: from *AIRSData* Internet site from years 1999, 1998, and 1997 at a monitor in the City of Chubbuck, Bannock CO, Idaho. Twenty-four hour concentration was based on the maximum value from the most recent 3 years, whereas the annual background concentration was based on the maximum of the most recent 3 years of annual means.

Table 7-4. Maximum toxic pollutant predictions

Toxic Pollutant	Maximum Concentration ($\mu g/m^3$)	Averaging Time	IDAPA AACC (ug/m3)	Acceptable?
Formaldehyde	0.007	Annual	0.077	yes
Arsenic	0.00002	Annual	0.00023	yes
Cadmium	0.0001	Annual	0.0056	yes
Nickel	0.0002	Annual	0.0042	yes

AACC = Acceptable Ambient Concentrations for carcinogens

(a) Maximum concentration predicted by ISCST3 using a screening meteorological data set and a IDEQ persistence factor. The maximum hourly concentration is converted to an annual averaging time using a persistence factor of 0.125.

Appendix C

AIRS Database Information

P-000306
J.R. Simplot Company, Aberdeen

ABBREVIATED AIRS DATA ENTRY SHEET

Name of Facility: J.R. Simplot Company - ABERDEEN

AIRS/Permit #: 011-00029

PTC Issued Date:

*Source/Emissions Unit Name (25 spcs) (Please use name as indicated in permit)	SCC # (8 digit #)	Air Program (SIP/NESHAP/ NSPS/PSD)
* Line 1 Dryer Burners	30290003	SIP
Line 1 Dryer (PM10)	30299999	SIP

RETURN TO PAT RAYNE
AIRS-PT.LST (9/95)