Statement of Basis

Permit to Construct No. P-2012.0043
Project ID 62423

McCain Foods
Burley, Idaho

Facility ID 031-00014

Final

April 24, 2020
Dan Pitman, PE
Permit Writer

The purpose of this Statement of Basis is to satisfy the requirements of IDAPA 58.01.01.et seq, Rules for the Control of Air Pollution in Idaho, for issuing air permits.

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ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

acfm	actual cubic feet per minute
Btu	British thermal units
CEMS	continuous emission monitoring systems
cfm	cubic feet per minute
CFR	Code of Federal Regulations
CI	compression ignition
CO	carbon monoxide
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EL	screening emission levels
EPA	U.S. Environmental Protection Agency
gr	grains (1 lb = 7,000 grains)
HAP	hazardous air pollutants
hp	horsepower
hr/yr	hours per consecutive 12 calendar month period
ICE	internal combustion engines
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometers
lb/hr	pounds per hour
m	meters
MACT	Maximum Achievable Control Technology
MMBtu	million British thermal units
MMscf	million standard cubic feet
NAAQS	National Ambient Air Quality Standard
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO_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
ppm	parts per million
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
RICE	reciprocating internal combustion engines
Rules	*Rules for the Control of Air Pollution in Idaho*
SM	synthetic minor
SM80	synthetic minor facility with emissions greater than or equal to 80% of a major source threshold
SO_2	sulfur dioxide
SO_x	sulfur oxides
T/day	tons per calendar day
T/yr	tons per consecutive 12 calendar month period
TAP	toxic air pollutants
U.S.C.	United States Code
VOC	volatile organic compounds
$\mu g/m^3$	micrograms per cubic meter

FACILITY INFORMATION

Description

McCain Foods USA, Inc. is a processing facility that produces frozen potato products such as french fries and tater tots for retail and institutional distribution. The existing facility, which is located in Burley, Idaho, is comprised of two plants: Burley Plant 1 and Burley Plant 2. The: Burley Plant 1 and Burley Plant 2 plants were constructed in the late 1950s to early 1960s. Originally, the plants were owned and operated by separate companies (Ore-Ida Foods, Inc. and Idaho Potato Processors, Inc.). The two plants were combined under the common ownership of Ore-Ida Foods in 1965. McCain Foods acquired the facility on July 1, 1997.

The emissions from McCain Foods are generated by five boilers, four dryers, four fryers, a dust collection system, emergency fire pump, three emergency generators, space heating equipment and an anaerobic lagoon biogas flare for use when biogas is not combusted in a boiler.

Permitting History

August 19, 1982	PTC 0440-0014, Permit Status (S)
June 25, 1985	PTC No. 0440-0014, Nebraska Boiler, Issued to Ore-Ida Foods, Permit status (S)
November 7, 2002	T2/PTC No. 031-00014, McCain Foods, Facility Wide Permit, Permit status (S)
April 7, 2004	P-030423, McCain Foods, Biogas Flare, Permit status (S)
December 27, 2005	T2-050423 McCain Foods, Revision of Permit issued December 7, 2002 for steam heated dryers (S)
July 28, 2006	P-060405, McCain Foods, Revision of Permit issued December 7, 2002 to combust biogas in boilers (S)
February 25, 2008	T2/PTC No. T2-2007.0233, McCain Foods, Renewed T2 operating permit (S)
August 16, 2012	P-2012.0043, Project 61085, McCain Foods, Converted T2/PTC to a PTC and incorporated the requirements of 40 CFR 63 Subpart ZZZZ (S)
April 25, 2014	P-2012.0043, Project 61312, to reconfigure the Burley Plant 2 (B2) Prime 2 dryer and fryer line and remove the existing steam-heated Parfry fryer (S)
February 16, 2018	P-2012.0043, Project 91942, to add a new boiler and potato processing line (S)
June 26, 2018	P-2012.0043, Project 62005, installation of a larger boiler (S)
October 16, 2018	P-2012.0043, Project 62128 Correction of SO_2 emission factor listed in the permit (S)
February 6, 2020	P-2012.0043, Project 62244 Increase allowable SO_2 emissions to greater than 100 tons per year (A, but will be S by this permit action)

Application Scope

McCain has proposed to reduce facility-wide allowable emissions to be less than 100 tons per year, specifically facility-wide SO_2 emissions will be reduced to 99.87 tons per year. All other pollutants are already limited to less than 100 tons per year and there are no changes to those emissions limits. There are no new or modified emissions units as part of this permit action.

Recent operating experience has identified that the facility is able to operate consistently and reliably with lower levels of H_2S in the biogas that is generated at the facility. Reduction in H_2S generation rates results in corresponding reduction rate in SO_2 emissions when biogas is combusted.

Application Chronology

April 7, 2020	DEQ received an application and an application fee.
April 8, 2020	DEQ determined that the application was complete.
April 9, 2020	DEQ made available the draft permit and statement of basis for peer and regional office review.
April 13, 2020	DEQ made available the draft permit and statement of basis for applicant review.
April 22, 2020	DEQ received the permit processing fee.

TECHNICAL ANALYSIS

Emissions Units and Control Equipment

Table 1 EMISSIONS UNIT AND CONTROL EQUIPMENT INFORMATION

Source	Control Equipment
Facility-wide (fugitive and point sources)	Reasonable Control
(B101)Murray 1 boiler, Model: Mcf4-78, 100 MMBtu/hr, natural gas and biogas (B102) Nebraska 1 boiler, Model: NS-E-68, 95.58 MMBtu/hr, natural gas and biogas (B202) Nebraska 2 boiler, Model: NS-E-57, 78.05 MMBtu/hr, natural gas (B203) Murray 2 boiler, Model: MCF2-38, 39.1 MMBtu/hr, natural gas (B301) Cleaver Brooks boiler, Model NB-400D-90, 109 MMBtu/hr natural gas/biogas (C001) Biogas flare, Varec, Model: 244W	None
(D109 – D111) Prime 1 dryer, Wolverine Proctor, steam heated (D107) Tot dryer, Rey Industries, 4 MMBtu/hr, direct-fired dryer, natural gas (D209- D211) Prime 2 dryer, National, steam heated	None
(F103) Tot fryer, Shockey Model: Ore-Ida, steam heated (F104) Prime 1 fryer, Shockey Model: Ore-Ida, steam heated (F204) Prime 2 fryer, heat and control, steam heated B3 Dryer and Fryer, steam heated	Air washer, Rey Ind. Air washer, Ore-Ida Air washer, Ore-Ida WESP
<u>Natural Gas Fired Air Makeup Units (AMU) & Heaters</u> AC#7 SOUTHEAST OVER CUTTING LAB ON PLT1 ROOF, 0.115 MMBtu/hr AC#8 NORTHEAST OVER MICRO LAB ON PLT1 ROOF, 0.074 MMBtu/hr AC#9 NORTH-MIDDLE OVER H2O RM ON PLT1 ROOF, 0.04 MMBtu/hr AC#10 NORTHWEST OVER PROCESSING LUNCHROOM ON PLT1 ROOF, 0.115 MMBtu/hr AC#11 MIDDLE OVER RESTROOMS ON PLT1 ROOF, 0.074 MMBtu/hr AC#12 SOUTHWEST OVER PROCESSING LUNCHROOM ON PLT1 ROOF, 0.115 MMBtu/hr AC#17 PKG. LUNCH ROOM IN DRY STORAGE ON LUNCHROOM ROOF, 0.115 MMBtu/hr AC#18 MAINTENANCE/ENGINEERING OFFICE ON ROOF, 0.115 MMBtu/hr HVAC#73 FOR PLT1 MAINTENANCE LUNCHROOM & MOTOR ROOM, 0.138 MMBtu/hr PLT2 PACKAGING AMU, 3.5 MMBtu/hr AC#37 PLT2 RESTROOM (WEST UNIT IN ATTIC), 0.1 MMBtu/hr AC#38 PLT2 RMU OFFICES (EAST UNIT IN ATTIC), 0.1 MMBtu/hr AC#39 ON PLT2 PKG QC LAB ROOF, 0.115 MMBtu/hr HVAC #101 -NORTH B2 PROC LUNCHRM & OFFICES, 0.115 MMBtu/hr HVAC #102 -SOUTH B2 PROC LUNCHRM & OFFICE, 0.072 MMBtu/hr PLT2 PROCESSING / Peeling #8 AMU, 6.6 MMBtu/hr PLT2 PEEL ROOM AMU, 4 MMBtu/hr	None

Source	Control Equipment
PLT2 ERS AREA AMU #9, 6.6 MMBtu/hr	
PLT2 CDI #4 PROCESSING AREA AMU, 5.6 MMBtu/hr	
PLT2 CDI #3 PROCESSING AREA AMU, 5.6 MMBtu/hr	
PLT2 REYCO FRYER AREA AMU, 5 MMBtu/hr	
PLT2 TRIM ROOM/DRYER AMU, 4 MMBtu/hr	
PLT2 OVER CUTTER AREA AMU, 6 MMBtu/hr	
PLT1 PEELER RM SOUTHEAST AMU, 3 MMBtu/hr	
PLT1 TRIM RM AIR MAKEUP /AC, 4 MMBtu/hr	
PLT1 ADR AREA AIR MAKEUP, 3 MMBtu/hr	
PLT1 IQF PRECOOL (SHREDS ROOM) AIR MAKEUP, 5 MMBtu/hr	
PLT1 PKG HB AMU /AC, 6 MMBtu/hr	
PLT1 TOT AIR MAKEUP UNIT, 2.5 MMBtu/hr	
PLT1 FRYER/DRYER AIR MAKEUP UNIT, 6 MMBtu/hr	
PLT1 PACKAGING AIR MAKEUP UNIT, 6 MMBtu/hr	
PLT1 CUTTING AREA AIR MAKEUP UNIT, 6 MMBtu/hr	
PLT1 -STARCH BLDG AIR MAKEUP, 0.65 MMBtu/hr	
PLT1 -WASTEHOUSE AIR MAKEUP, 3 MMBtu/hr	
b1 dock heater, 0.93 MMBtu/hr	
PLT1 RECEIVING AIR MAKEUP UNIT, 3 MMBtu/hr	
PLT1 RECEIVING AIR MAKEUP UNIT #158, 4 MMBtu/hr	
PLT2 RECEIVING DOCK AMU, 1.5 MMBtu/hr	
HVAC#65 -PLT1 BOILER ROOM 0.26	
PLT1 BOILER RM AIR MAKEUP, 2 MMBtu/hr	
PLT2 DRY INGREDIENT WAREHOUSE AMU, 3 MMBtu/hr	
Central Receiving AMU1, 2.475 MMBtu/hr	
Central Receiving AMU2, 2.475 MMBtu/hr	
Central Receiving AMU3, 2.063 MMBtu/hr	
Central Receiving AMU4, 2.063 MMBtu/hr	
Central Receiving AMU5, 2.063 MMBtu/hr	
Central Receiving AMU6, 2.063 MMBtu/hr	
Central Receiving AMU7, 2.063 MMBtu/hr	
Central Receiving AMU8, 2.063 MMBtu/hr	
Central Receiving AMU9, 2.063 MMBtu/hr	
Central Receiving Rooftop Unit, 0.08 MMBtu/hr	
Central Receiving Rooftop Unit, 0.08 MMBtu/hr	
Central Receiving Gas Unit Heater, 1.345 MMBtu/hr	
Central Receiving Gas Unit Heater, 1.345 MMBtu/hr	
Central Receiving Gas Unit Heater, 1.345 MMBtu/hr	
Central Receiving Gas Unit Heater, 1.345 MMBtu/hr	
Central Receiving Gas Unit Heater, 1.345 MMBtu/hr	
Central Receiving Gas Unit Heater, 1.345 MMBtu/hr	
B3 Process Area Air Handling Unit, 3 MMBtu/hr	
B3 Process Area Air Handling Unit, 3 MMBtu/hr	
B3 Process Area Air Handling Unit, 2.5 MMBtu/hr	
B3 Process Area Air Handling Unit, 6.15 MMBtu/hr	
B3 Process Area Air Handling Unit, 3 MMBtu/hr	
B3 Dry Storage Area Air Handling Unit, 2.5 MMBtu/hr	
B3 Dry Storage Area Air Handling Unit, 2.5 MMBtu/hr	
B3 Process Area Air Handling Unit, 2.5 MMBtu/hr	
B3 Process Area Rooftop Unit, 2.5 MMBtu/hr	
B3 Process Area Rooftop Unit, 0.15 MMBtu/hr	
B3 Process Area Rooftop Unit, 0.075 MMBtu/hr	
B3 Process Area Rooftop Unit, 0.15 MMBtu/hr	

Source	Control Equipment
B3 Process Area Rooftop Unit, 0.15 MMBtu/hr B3 Process Area Rooftop Unit, 0.075 MMBtu/hr B3 Process Area AMU-01, 4.125 MMBtu/hr B3 Process Area AMU-02, 4.125 MMBtu/hr B3 Process Area AMU-03, 4.125 MMBtu/hr B3 Process Area AMU-04, 4.125 MMBtu/hr B3 Process Area AMU-05, 4.125 MMBtu/hr B3 Process Area AMU-06, 4.125 MMBtu/hr B3 Process Area Gas Heating Unit, 0.105 MMBtu/hr B3 Process Area Gas Heating Unit, 0.105 MMBtu/hr B3 Process Area Gas Heating Unit, 0.105 MMBtu/hr B3 Process Area Gas Heating Unit, 0.105 MMBtu/hr	
(E209) Batter Room collector	Dust collector
(E001) Emergency fire pump, Detroit Diesel Model: 6061-A2, No. 1 or No. 2 fuel oil	None
Fire Pump Engine, 170 Horsepower, Diesel Fuel, Compression Ignition 3-Emergency Generators, Two at 30 Horsepower and one at 25 kW, Natural Gas, Spark Ignition	None

Emissions Inventories

This permit action is solely to reduce the allowable SO_2 emissions from the Cleaver Brooks boiler and biogas flare. All other emissions rates remain the same.

Pre-Project Potential to Emit

Pre-project Potential to Emit is used to establish the change in emissions at a facility as a result of this project. Pre-project Potential to Emit for this permit action equals the post project potential to emit for the previous permit action documented in the February 6, 2020, statement of basis.

The following table presents the pre-project potential to emit for all criteria pollutants from all emissions units at the facility for the purpose of determining the permit processing fee, which is the difference in emissions allowed by the permits. See the February 6, 2020, statement of basis for details on the emissions estimates.

Table 1 PRE-PROJECT POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

Source	$PM_{10}/PM_{2.5}$ T/yr[(a)]	SO_2 T/yr[(a)]	NO_X T/yr[(a)]	CO T/yr[(a)]	VOC T/yr[(a)]
Murray 1 Boiler Nebraska 1 Boiler Nebraska 2 Boiler Murray 2 Boiler Cleaver Brooks Boiler Biogas Combustion at Flare	7.41	175.81	79.5	81.9	5.36
Prime 1 Dryer	21.67	0.00	0.00	0.00	- [(b)]
Tot Dryer	6.48	0.01	1.50	1.26	- [(b)]
Prime 2 Dryer	17.93	0.00	0.00	0.00	- [(b)]
Tot Fryer	13.22	0.00	0.00	0.00	2.6
Prime 1 Fryer	8.67	0.00	0.00	0.00	8.67
Prime 2 Fryer	7.29	0.00	0.00	0.00	7.29
B3 Dryer/Fryer	8.4	0.00	0.00	0.00	50.7
Batter Room collector	0.53	0.00	0.00	0.00	0.00
Emergency Engines	0.02	0.0001	0.42	0.06	0.03
AMU/AC/Heaters	0.53	0.09	15	12.6	0.83
Pre-Project Totals	**92**	**175.91**	**96.42**	**95.82**	**76**

a) Controlled average emission rate in tons per year is an annual average, based on the proposed annual operating schedule and annual limits.

b) McCain did not include VOC emissions from drying of potato products in the Prime 1&2 dyers or Tot Dryer, DEQ believes that some VOC emissions will occur from drying potatoes but the amount of emissions will not affect the major facility determination. If VOC emissions were to

be estimated using AP-42 Section 9.13.3 from deep fat frying of potato chips (0.02 lb VOC/ton) emissions would be less than 6 tons per year from the Prime 1 & 2 Dryer, and Tot Dryer. VOC emissions are expected to much less from drying potatoes compared to frying potato chips.

Post Project Potential to Emit

Post project Potential to Emit is used to establish the change in emissions at a facility and to determine the facility's classification as a result of this project and to determine the permit processing fee. Post project Potential to Emit includes all permit limits resulting from this project.

The following table presents the post project Potential to Emit for criteria pollutants from all emissions units at the facility. See the application for a detailed presentation of the calculations for the SO_2 rate calculations and see the June 26, 2018 statement of basis for details on the other pollutant emissions estimates.

Table 2 POST PROJECT POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

Source	$PM_{10}/PM_{2.5}$	SO_2	NO_X	CO	VOC
	T/yr	T/yr	T/yr	T/yr	T/yr
Murray 1 Boiler Nebraska 1 Boiler Nebraska 2 Boiler Murray 2 Boiler Cleaver Brooks Boiler Biogas Combustion at Flare	7.41	99.67	79.5	81.9	5.36
Prime 1 Dryer	21.67	0.00	0.00	0.00	-
Tot Dryer	6.48	0.01	1.50	1.26	-
Prime 2 Dryer	17.93	0.00	0.00	0.00	-
Tot Fryer	13.22	0.00	0.00	0.00	2.6
Prime 1 Fryer	8.67	0.00	0.00	0.00	8.67
Prime 2 Fryer	7.29	0.00	0.00	0.00	7.29
B3 Dryer/Fryer	8.4	0.00	0.00	0.00	50.7
Batter Room collector	0.53	0.00	0.00	0.00	0.00
Emergency Engines	0.02	0.0001	0.42	0.06	0.03
AMU/AC/Heaters	0.53	0.09	15	12.6	0.83
Post-Project Totals	**92**	**99.87**	**96.42**	**95.82**	**76**

Change in Potential to Emit

The change in facility-wide potential to emit is used to determine if a public comment period may be required and to determine the processing fee per IDAPA 58.01.01.225. The following table presents the facility-wide change in the potential to emit for criteria pollutants.

Table 3 CHANGES IN POTENTIAL TO EMIT FOR REGULATED AIR POLLUTANTS

Source	$PM_{10}/PM_{2.5}$	SO_2	NO_X	CO	VOC
	T/yr	T/yr	T/yr	T/yr	T/yr
Pre-Project Potential to Emit	**92**	**175.91**	**96**	**96**	**76**
Post Project Potential to Emit	**92**	**99.87**	**96**	**96**	**76**
Changes in Potential to Emit	**0**	**-76**	**0**	**0**	**0**

TAP & HAP Emissions

Toxic and hazardous air pollutant emissions rates do not change as result of this project.

Ambient Air Quality Impact Analyses

There is not an increase of emissions therefore an ambient impact analysis is not required for this permit action.

REGULATORY ANALYSIS

Attainment Designation (40 CFR 81.313)

The facility is located in Cassia County, which is designated as attainment or unclassifiable for $PM_{2.5}$, PM_{10}, SO_2, NO_2, CO, and Ozone. Refer to 40 CFR 81.313 for additional information.

Facility Classification

The AIRS/AFS facility classification codes are as follows:

For HAPs (Hazardous Air Pollutants) Only:

A = Use when any one HAP has permitted emissions > 10 T/yr or if the aggregate of all HAPS (Total HAPs) has permitted emissions > 25 T/yr.

SM80 = Use if a synthetic minor (uncontrolled HAPs emissions are > 10 T/yr or if the aggregate of all uncontrolled HAPs (Total HAPs) emissions are > 25 T/yr and permitted emissions fall below applicable major source thresholds) and the permit sets limits > 8 T/yr of a single HAP or ≥ 20 T/yr of Total HAPs.

SM = Use if a synthetic minor (uncontrolled HAPs emissions are > 10 T/yr or if the aggregate of all uncontrolled HAPs (Total HAPs) emissions are > 25 T/yr and permitted emissions fall below applicable major source thresholds) and the permit sets limits < 8 T/yr of a single HAP and/or < 20 T/yr of Total HAPs.

B = Use when the potential to emit (i.e. uncontrolled emissions and permitted emissions) are below the 10 and 25 T/yr HAP major source thresholds.

UNK = Class is unknown.

For All Other Pollutants:

A = Use when permitted emissions of a pollutant are > 100 T/yr.

SM80 = Use if a synthetic minor for the applicable pollutant (uncontrolled emissions are > 100 T/yr and permitted emissions fall below 100 T/yr) and permitted emissions of the pollutant are ≥ 80 T/yr.

SM = Use if a synthetic minor for the applicable pollutant (uncontrolled emissions are > 100 T/yr and permitted emissions fall below 100 T/yr) and permitted emissions of the pollutant are < 80 T/yr.

B = Use when the potential to emit (i.e. uncontrolled emissions and permitted emissions) are below the 100 T/yr major source threshold.

UNK = Class is unknown.

Table 2 REGULATED AIR POLLUTANT FACILITY CLASSIFICATION

Pollutant	Uncontrolled PTE (T/yr)	Permitted PTE (T/yr)	Major Source Thresholds (T/yr)	AIRS/AFS Classification
PM	>100	92	**100**	SM80
PM_{10}	>100	92	**100**	SM80
$PM_{2.5}$	>100	92	**100**	SM80
SO_2	>100	99.9	**100**	SM80
NO_X	>100	96	**100**	SM80
CO	>100	96	**100**	SM80
VOC	<100	76	**100**	B
HAP (single)	<10	5.03	**10**	B
HAP (total)	<25	5.28	**25**	B
Pb	<100	<0.01	**100**	B

Permit to Construct (IDAPA 58.01.01.201)

IDAPA 58.01.01.201..... Permit to Construct Required

The permittee has requested that a PTC be issued to the facility for the reduction in SO_2 emissions. Therefore, a permit to construct is required to be issued in accordance with IDAPA 58.01.01.220. This permitting action was processed in accordance with the procedures of IDAPA 58.01.01.200-228.

Tier II Operating Permit (IDAPA 58.01.01.401)

IDAPA 58.01.01.401..... Tier II Operating Permit

The facility is not subject to IDAPA 58.01.01.300-399, and the applicant did not apply for a Tier II operating permit in accordance with IDAPA 58.01.01.401. This permitting action was processed in accordance with the procedures of IDAPA 58.01.01.400-410.

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

IDAPA 58.01.01.301..... Requirement to Obtain Tier I Operating Permit

Post project facility-wide emissions from this facility do not have a potential to emit greater than 100 tons per year for PM_{10}, SO_2, NO_X, CO, and VOC or 10 tons per year for any one HAP or 25 tons per year for all HAP combined as demonstrated previously in the Emissions Inventories Section of this analysis. Therefore, the facility is not a Tier I source in accordance with IDAPA 58.01.01.006 and the requirements of IDAPA 58.01.01.301 do not apply. The sole purpose of this permit action is to limit facility-wide criteria air pollutant emissions to less than 100 tons per year so that the facility will no longer be subject to Tier I permit requirements.

PSD Classification (40 CFR 52.21)

40 CFR 52.21 ..... Prevention of Significant Deterioration of Air Quality

The facility is not a major stationary source as defined in 40 CFR 52.21(b)(1), nor is it undergoing any physical change at a stationary source not otherwise qualifying under paragraph 40 CFR 52.21(b)(1) as a major stationary source, that would constitute a major stationary source by itself as defined in 40 CFR 52. Therefore in accordance with 40 CFR 52.21(a)(2), PSD requirements are not applicable to this permitting action. The facility is not a designated facility as defined in 40 CFR 52.21(b)(1)(i)(a), and does not have facility-wide emissions of any criteria pollutant that exceed 250 T/yr. However, the input capacity of all boilers at the facility exceeds 250 MMBtu/hr making the boilers a nested source category that is designated, though the boiler emissions are less than 100 tons per year and nested source is not subject to PSD.

NSPS, NESHAP, MACT/GACT Applicability (40 CFR 60, 61 & 63)

The purpose of this permit action is to reduce SO_2 emission rates from the Cleaver- Brooks boiler and biogas flare. These permit revisions do not affect the applicability of any NSPS, NESHAP or MACT/GACT.

Permit Conditions Review

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

Existing Permit Condition 2.15

This permit condition required the facility to submit a Tier I application. With this permit action the PTE of the facility is limited to below Tier I permitting thresholds and this condition has been removed from the permit.

Existing Permit Condition 2.16

This permit condition required stack height and configurations to be change within one year of permit issuance. This permit condition now lists the actual date, February 6, 2021, instead of saying within one year.

Existing Permit Conditions 3.11, 3.13.2 and 3.15 required actions to be taken by the permittee within 60 days of previous permit issuances. In all cases 60 days has passed and requirements to take action (i.e. submit protocols for monitoring) "within 60 days of permit issuance" are obsolete requirements and have been removed from the permit.

Table 9.1

The Cleaver-Brooks boiler and biogas flare limit has been reduced to 98.97 tons per year. The annual SO_2 emissions limit on all of the boilers combined is no longer necessary and has been removed from the permit because facility-wide emissions are limited below 100 tons per year.

PUBLIC REVIEW

Public Comment Opportunity

Because this permitting action does not authorize an increase in emissions, an opportunity for public comment period was not required or provided in accordance with IDAPA 58.01.01.209.04.

APPENDIX A – PROCESSING FEE

PTC Processing Fee Calculation Worksheet

Instructions:
Fill in the following information and answer the following questions with a Y or N. Enter the emissions increases and decreases for each pollutant in the table.

Company:	**McCain Foods**
Address:	**218 West Highway 30**
City:	**Burley**
State:	**Idaho**
Zip Code:	**83318**
Facility Contact:	**Dough Hahn**
Title:	**Permit Contact**
AIRS No.:	**031-00014**

N	Does this facility qualify for a general permit (i.e. concrete batch plant, hot-mix asphalt plant)? Y/N
Y	Did this permit require engineering analysis? Y/N
N	Is this a PSD permit Y/N (IDAPA 58.01.01.205.04)

Emissions Inventory			
Pollutant	Annual Emissions Increase (T/yr)	Annual Emissions Reduction (T/yr)	Annual Emissions Change (T/yr)
NO_X	0.0	0	0.0
SO_2	0.0	76	-76.0
CO	0.0	0	0.0
PM10	0.0	0	0.0
VOC	0.0	0	0.0
Total:	0.0	76	**-76.0**
Fee Due	**$ 1,000.00**		

Comments: