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Air Title V Operating Permit (AOP) - Renewal

version 2.5

(Submission #: HQ0-CM71-TX2SS, version 1)

Details

Submission ID HQ0-CM71-TX2SS

Status In Process

Form Input

Form Instructions

In accordance with 33.1-15-14-04.c. of the North Dakota Air Pollution Control Rules, a Title V permit renewal application must be submitted to the Department at least six months, but no more than eighteen months, prior to the expiration date. Permit renewal applications are incomplete unless all information requested in SFN 52824 is supplied. The current Title V permit will be the baseline reference for a renewal. The requirements (40 CFR 70.5(c) & NDAC 33.1-15-14-06.4.c) to include a citation and description of all applicable requirements and a description of or reference to any applicable test method for determining compliance with each applicable requirement may be met by accomplishing either or both of the following: 1) provide an annotated (red-lined) copy of the current permit indicating all changes needed to reflect the current facility configuration, applicable requirements and test methods; 2) provide a narrative that conveys all changes needed to the current permit to reflect the current facility configuration, all applicable requirements and test methods.

FOR ACID RAIN UNITS ONLY • Submit with the Title V permit renewal application all Acid Rain renewal applications (the Acid Rain Permit Application, the Phase II NOx Compliance Plan, and if applicable, the Phase II NOx Averaging Plan).

When completing the online application, if uploaded files are provided in each section (when indicated), do not include those same files in the General Document Upload/File Upload section. If uploading the application files in the General Document Upload/File Upload section, only fill out the required (asterisked) sections of the online application.

Section A - Permit Information

Permit Number
AOP-28367

Permit Version
5

Issue Date
10/15/2019

Expiration Date
07/06/2024

Permittee

Company Name
J.R. Simplot Company

Address

3630 Gateway Drive

Grand Forks, ND 58203

United States

Responsible Official

Prefix
NONE PROVIDED

First Name	Last Name
David	*Valdez*

Title
Unit Director

Phone Type	Number	Extension
Mobile	(509) 793-1143	

Email
David.Valdez@simplot.com

Address
3630 Gateway Drive
Grand Forks, ND 58203
United States

Contact Person for Air Pollution Matters

Prefix
NONE PROVIDED

First Name	Last Name
Eric	*Halstenson*

Title
Environmental Manager

Phone Type	Number	Extension
Business	7017466431	7848

Email
eric.halstenson@simplot.com

Address
3630 Gateway Drive
Grand Forks, ND 58203
United States

Section B (Part 1) - Facility Information

Facility Name
J.R. Simplot Company - Grand Forks Facility

Have you added, removed, or made any modifications to equipment since your last operating permit issuance?
Yes

Is this source subject to Title IV Acid Rain regulations?
No

Is this a portable source?
No

Facility Location
3630 Gateway Drive
Grand Forks, ND 58203
United States

County
Grand Forks

Facility Location:
47.93316999999999,-97.08080999999999

3630 Gateway Drive, Grand Forks, ND

Please download the form linked here, complete it, and upload it to this application using the attachment control below.

When completing the online application, if uploaded files are provided in each section (when indicated), do not include those same files in the General Document Upload/File Upload section. If uploading the application files in the General Document Upload/File Upload section, only fill out the required (asterisked) sections of the online application.
PERMIT APPLICATION FOR TITLE V PERMIT TO OPERATE (SFN52858)

Attach completed form here

Permit Application for Title V Permit to Operate Form 52858.pdf - 01/03/2024 03:56 PM
Comment
NONE PROVIDED

Section B (Part 2) - Additional Location Information

Legal Description of Facility Site

Qtr Qtr	Qtr	Section	Township	Range
NONE PROVIDED	SW	32	152N	50W

Land area at facility site (indicate whether measurement is in acres or sq. ft.)
NONE PROVIDED

MSL elevation at facility
NONE PROVIDED

Section C - Nature of Business

General Nature of Business

Describe Nature of Business	NAICS Code	SIC Code
Frozen potato manufacture	311411-Frozen Fruit, Juice, and Vegetable Manufacturing	2037-Frozen Fruits, Fruit Juices, and Vegetables

Actual Start of Construction Date
NONE PROVIDED

Actual End of Construction Date
NONE PROVIDED

Facility Startup Date
NONE PROVIDED

Section D - Process Equipment Information (1 of 1)

Emission Unit -

Emission Unit ID
NONE PROVIDED

Emission Unit Description
NONE PROVIDED

Emission Point ID
NONE PROVIDED

Emission Point Description
NONE PROVIDED

Emission Process Description
NONE PROVIDED

Emission Unit Status
NONE PROVIDED

Applicable PTCs

PTC Number

Applicable Federal Air Programs

Program Code

Applicable State Regulations

Regulation

Emission Unit form
Download the emission unit form linked here, complete it, and upload it to this application using the attachment control below.

When completing the online application, if uploaded files are provided in each section (when indicated), do not include those same files in the General Document Upload/File Upload section. If uploading the application files in the General Document Upload/File Upload section, only fill out the required (asterisked) sections of the online application.
EMISSION UNIT FOR TITLE V PERMIT TO OPERATE (SFN61006)

Attach Emission Unit Form
Emission Unit for Title V Permit to Operate Form 61006.pdf - 01/06/2024 06:27 AM
Comment
NONE PROVIDED

Section E - Control Equipment (1 of 1)

Emission Unit: `EU_ID` - `EU_DESC`

Control Equipment ID
NONE PROVIDED

Emission units being controlled by this control unit
NONE PROVIDED

Control Equipment Description
NONE PROVIDED

Control equipment form
Download the form linked here, complete it, and upload it to this application using the attachment control below.

When completing the online application, if uploaded files are provided in each section (when indicated), do not include those same files in the General Document Upload/File Upload section. If uploading the application files in the General Document Upload/File Upload section, only fill out the required (asterisked) sections of the online application.
PERMIT APPLICATION FOR AIR POLLUTION CONTROL EQUIPMENT (SFN8532)

Attach Control Equipment Form
NONE PROVIDED
Comment
NONE PROVIDED

Section F - Facility-Wide Applicable Regulations and Potential to Emit (PTE)

Applicable Federal Air Programs

Program Code

Applicable State Regulations

Regulation

Potential to Emit (PTE)

Pollutant	Tons Per Year Without Fugitives	Tons Per Year With Fugitives
NOx	NONE PROVIDED	NONE PROVIDED
CO	NONE PROVIDED	NONE PROVIDED
VOCs	NONE PROVIDED	NONE PROVIDED
SO2	NONE PROVIDED	NONE PROVIDED
PM	NONE PROVIDED	NONE PROVIDED
PM10	NONE PROVIDED	NONE PROVIDED
PM2.5	NONE PROVIDED	NONE PROVIDED
Total HAPs	NONE PROVIDED	NONE PROVIDED

Emission Calculations Document Upload
Using the attachment control below, upload emission calculations documents.

When completing the online application, if uploaded files are provided in each section (when indicated), do not include those same files in the General Document Upload/File Upload section. If uploading the application files in the General Document Upload/File Upload section, only fill out the required (asterisked) sections of the online application.

Attach Emission Calculations Documents
Emission Inventory.pdf - 01/06/2024 06:29 AM
Comment
NONE PROVIDED

Section G - Compliance Schedule

Will your facility be in compliance with all applicable requirements effective at the time of permit issuance?
Yes

Will your facility be in compliance with all applicable requirements effective after the time of permit issuance?
Yes

Section H - Flexible Permits

Are you requesting a flexible permit?
No

Section I - Compliance Assurance Monitoring (CAM)

To determine if your facility is subject to CAM, review the information provided at the following link.
Compliance Assurance Monitoring (CAM) Guidance

Is the facility identified in this application in compliance with applicable monitoring and compliance certification requirements?
Yes, the facility IS in compliance with applicable monitoring and compliance certification requirements.

Section K - Redline Permit Upload

Use the attachment control below to upload a redline version of your existing permit document, showing any changes.

When completing the online application, if uploaded files are provided in each section (when indicated), do not include those same files in the General Document Upload/File Upload section. If uploading the application files in the General Document

Upload/File Upload section, only fill out the required (asterisked) sections of the online application.

Attach redline version of permit here

Title V Permit Redline.pdf - 01/06/2024 06:32 AM

Comment

NONE PROVIDED

Section L - General Document Upload

File Upload

Use the attachment control below to upload any other information necessary for application review, such as plot plans, process diagrams, maps, etc.

When completing the online application, if uploaded files are provided in each section (when indicated), do not include those same files in the General Document Upload/File Upload section. If uploading the application files in the General Document Upload/File Upload section, only fill out the required (asterisked) sections of the online application.

Attachments

Simplot Grand Forks ND - Title V Renewal Application Transmittal.pdf - 01/06/2024 06:33 AM

Comment

NONE PROVIDED

Additional Forms

NONE PROVIDED

Attachments

Date	Attachment Name	Context	User
1/6/2024 6:33 AM	Simplot Grand Forks ND - Title V Renewal Application Transmittal.pdf	Attachment	Eric Halstenson
1/6/2024 6:32 AM	Title V Permit Redline.pdf	Attachment	Eric Halstenson
1/6/2024 6:29 AM	Emission Inventory.pdf	Attachment	Eric Halstenson
1/6/2024 6:27 AM	Emission Unit for Title V Permit to Operate Form 61006.pdf	Attachment	Eric Halstenson
1/3/2024 3:56 PM	Permit Application for Title V Permit to Operate Form 52858.pdf	Attachment	Eric Halstenson

Status History

	User	Processing Status
1/3/2024 3:21:12 PM	Eric Halstenson	Draft
1/6/2024 6:46:37 AM	Eric Halstenson	Signing
1/6/2024 9:46:25 AM	David Valdez	Submitting
1/6/2024 9:47:54 AM	David Valdez	Submitted
1/6/2024 9:48:02 AM	David Valdez	In Process

Agreements and Signature(s)

SUBMISSION AGREEMENTS

- ☑ I am the owner of the account used to perform the electronic submission and signature.
- ☑ I have the authority to submit the data on behalf of the facility I am representing.
- ☑ I agree that providing the account credentials to sign the submission document constitutes an electronic signature equivalent to my written signature.
- ☑ I have reviewed the electronic form being submitted in its entirety, and agree to the validity and accuracy of the information contained within it to the best of my knowledge.

I certify under penalty of lawthat the enclosed documents and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I also certify that the source(s) identified in this application is/are in compliance with all applicable requirements except those requirements for which a compliance schedule has been submitted in the Compliance Schedule Form or Compliance Schedule Section of the application . I understand that failure to comply with any term of a compliance schedule is considered to be a violation of regulation NDAC 33.1-15-14-06.1.e. The source will continue to comply with the current applicable requirements with which it is in compliance. The source will meet, on a timely basis, any applicable requirement, which becomes effective during the permit term. The source is properly implementing any required risk management plan in accordance with section 112(r) of the federal clean air act, if appropriate.

I certify, as the Responsible Official, that I have read and understood the above requirements and conditions applicable to my source/facility and that the information and attachments provided in this application are true, accurate, and complete to the best of my knowledge." Further, I agree to comply with the provisions of Chapter 23.1-06 of the North Dakota Century Code and all rules and regulations of the Department, or revisions thereof. I also understand a permit is nontransferable and, if granted a permit, I will promptly notify the Department upon sale or legal transfer of this permitted establishment.

Note: This certification must be signed by a "responsible official" as defined in NDAC 33.1-15-14-06.1.

Signed By David Valdez on 01/06/2024 at 9:46 AM

J.R. Simplot Company
3630 Gateway Drive
Grand Forks, ND 58203

January 3, 2024

North Dakota Department of Environmental Quality
Division of Air Quality
4201 Normandy Street, 2nd Floor
Bismarck, ND 58503-1324

Attn: Kyla Schneider

Re: Title V Permit Renewal Application
J.R. Simplot Company Grand Forks Potato Processing Plant
Grand Forks, North Dakota

Dear Kyla:

The Title V Permit to Operate No. AOP-28367 v5.0 (previously T5-F76008_4_0) for the J.R. Simplot Company (Simplot) Grand Forks, North Dakota potato processing plant is scheduled to expire on July 6, 2024. In accordance with North Dakota regulations (33.1-15-14-06 Title V permit to operate), Simplot is submitting this renewal application at least six months prior to the scheduled Title V permit expiration date. This permit application also satisfies the requirement to submit an application, within 12 months of installation, for a modification of the facility with respect to the replacement of the Lines 3 and 4 with a new Line 4, installation of a wet electrostatic precipitator (WESP) to control emissions from the new Line 4 fryer (Emission Point PF4), and installation of an emergency diesel generator engine for the high-bay freezer.

This Title V renewal application includes multiple attachments:

1. A completed and signed Title V renewal application with certification form,
2. A signed Title V Permit to Operate form for updated sections of this Title V renewal application,
3. Emission Unit form for the new Kohler emergency diesel generator engine
4. Red-line mark-up of the existing Title V permit with suggested changes to current emission unit listing and permit conditions, and
5. Compliance Assurance Monitoring (CAM) applicability analysis confirming that uncontrolled emissions from the new WESP (PF4) are less than 100 tons per year and CAM is not applicable to the WESP controlling the Line 4 fryer.

If your staff have any questions regarding the information provided in this Title V permit renewal application or need further information, please contact me at (701) 780-7848 or Eric.Halstenson@Simplot.com.

Sincerely,

J.R. Simplot Company

Eric Halstenson
Plant Environmental Manager

Enclosure

CC: Martin Bauer, J.R. Simplot Company

USEPA Region 8: Air Program (8P-AR)
Office of Partnerships & Regulatory Assistance
US EPA Region 8
1595 Wynkoop Street
Denver, CO 8020-1129

AIR POLLUTION CONTROL
TITLE V PERMIT TO OPERATE

Permittee: **Name:** J.R. Simplot Company **Address:** 3630 Gateway Drive Grand Forks, ND 58203	**Permit Number:** T5-F76008 **Source Name:** J.R. Simplot Company
Source Location: 3630 Gateway Drive Grand Forks, ND Grand Forks County	**Source Type:** Potato Processing; Food Products
Expiration Date: July 6, 2024	

Pursuant to Chapter 23.1-06 of the North Dakota Century Code, and the Air Pollution Control Rules of the State of North Dakota, Article 33.1-15 of the North Dakota Administrative Code (NDAC), and in reliance on statements and representations heretofore made by the permittee (i.e., owner) designated above, a Title V Permit to Operate is hereby issued authorizing such permittee to operate the emissions units at the location designated above. This Title V Permit to Operate is subject to all applicable rules and orders now or hereafter in effect of the North Dakota Department of Environmental Quality (Department) and to any conditions specified on the following pages. All conditions are enforceable by EPA and citizens under the Clean Air Act unless otherwise noted.

Renewal No. 4: 10/15/19
Revision No. 0: _____

_____
James L. Semerad
Director
Division of Air Quality

J.R. Simplot Company
Title V Permit to Operate
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Permit Shield

Compliance with the terms and conditions of this permit 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 this permit; or
- The Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the determination or a concise summary thereof, is included in this permit.

Applicable Requirement: NDAC 33.1-15-14-06.5.f(1)

1. **Emission Unit Identification:**

The emission units regulated by this permit are as follows:

Emission Unit Description	Emission Unit (EU)	Emission Point (EP)	Air Pollution Control Equipment
Natural gas-fired Cleaver-Brooks Model D68 boiler with a rated heat input of 50.287 x 10^6 Btu/hr	B1	B1	None
Natural gas/biogas-fired Cleaver-Brooks Model D94 boiler with a rated heat input of 75.431 x 10^6 Btu/hr (2013)	B2	B2	None
Natural gas-fired Cleaver-Brooks Model DL-68-RH boiler rated at 73.19 x 10^6 Btu/hr heat input (1995)	B3	B3	None
Line 1 french fry process dryer equipped with eight natural gas/propane-fired burners rated at 3.7 x 10^6 Btu/hr each	D1	D1A & D1B	None
Natural gas~~/propane~~-fired potato dryer with a rated heat input capacity of ~~27~~ 9.65 x 10^6 Btu/hr	D4	D4A & D4B	None
Line 2 retrograde dryer/cooler rated at 9,000 pounds of product per hour	D5	D5	None
Line 1 potato fryer rated at 45,000 pounds of finished product per hour	PF1	PF1	Wet Electrostatic Precipitator (WESP)
Line 2 potato fryer rated at 9,000 pounds of finished product per hour	PF2		
~~Line 3 potato fryer rated at 5,200 pounds of finished product per hour~~	~~PF3~~	~~PF3~~	~~Scrubber~~
Line 4 potato fryer rated at 45,000 pounds of finished product per hour	PF4	PF4	~~Scrubber~~WESP

Emission Unit Description	Emission Unit (EU)	Emission Point (EP)	Air Pollution Control Equipment
Two potato by-product dryers, each rated at 15.18 tons/hr wet material. Each dryer is equipped with a natural gas/propane-fired burner rated at 18 x 10^6 Btu/hr.	F1 & F2	F1 & F2	Baghouses (one for each unit)
By-product cooler with a process weight rate of 2.25 tons/hr	F5	F5	Baghouse
Truck loadout with a rated capacity of 90.0 tons/hr	F8	F8	Baghouse
Digester gas flare rated at 55 x 10^6 Btu/hr	FL1	FL1	None
Cummins emergency diesel generator engine rated at 300 kW (407 bhp, built 2013); Tier 3 certified (IIII)	E1 [A]	E1	None
Kohler emergency diesel generator engine rated at 150 kW (201 bhp, manufactured 2019), Tier 3 certified (IIII)	E2 [A]	E2	None
Various natural gas-fired air handling units and unit heaters rated from 0.1 x 10^6 Btu/hr to 11.4 x 10^6 Btu/hr with a total heat input of <120 x 10^6 Btu/hr	Various [B]	N/A [C]	None

[A] The potential to emit for an emergency stationary reciprocating internal combustion engine (RICE) is based on operating no more hours per year than is permitted by the subparts (40 CFR 60, Subpart IIII and 40 CFR 63, Subpart ZZZZ) for other than emergency situations. For engines to be considered emergency stationary RICE under the RICE rules, engine operations must comply with the operating hour limits as specified in the applicable subparts (40 CFR 60, Subpart IIII and 40 CFR 63, Subpart ZZZZ). There is no time limit on the use of emergency stationary RICE in emergency situations.

[B] Insignificant or fugitive emission sources (no specific emission limit).

[C] These units are internally vented.

Note: All process weight rates, heat inputs and horsepower are considered nominal unless otherwise noted.

2. **Applicable Standards, Restrictions and Miscellaneous Conditions:**

A. **Fuel Restrictions:**

1) The fuel burning equipment (except for EU B2, E1, and ~~E1~~E2) is restricted to combusting only natural gas and propane.

2) EU B2 (Boiler No. 2) is restricted to combusting natural gas, propane and biogas. Natural gas is restricted to no more than 2 grains of sulfur per 100 standard cubic feet and biogas is restricted to no more than 500 ppm hydrogen sulfide by volume.

a) The concentration of hydrogen sulfide in the biogas burned shall be monitored and recorded weekly. If the concentration of hydrogen sulfide in the biogas is found to exceed 500 ppm by volume, then the owner/operator shall contact the Department within 10 days of the measurement.

3) EU E1 and E2 (emergency generator engines) ~~is~~ are restricted to combusting only distillate oil containing no more than 0.0015 percent sulfur by weight.

Applicable Requirements: PTC14003 and NDAC 33.1-15-12-02, Subpart IIII

B. **New Source Performance Standards (NSPS)**: The permittee shall comply with all applicable requirements of the following NDAC 33.1-15-12-02 and 40 CFR 60 subparts in addition to complying with Subpart A – General Provisions.

1) Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (EU B2 and B3).

3) Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (EU E1 and E2).

Applicable Requirements: NDAC 33.1-15-12, Subparts A, Dc and IIII

C. **Maximum Achievable Control Technology (MACT)**: The permittee shall comply with all applicable requirements of the following NDAC 33.1-15-22-03 and 40 CFR 63 subparts in addition to complying with Subpart A - General Provisions.

1) Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (EU E1 and E2). Compliance with 40 CFR 63, Subpart ZZZZ is achieved through complying with 40 CFR 60, Subpart IIII. The North Dakota Department of Environmental Quality has not adopted the area source provisions of this subpart. Please send all documentation to EPA at the following address:

U.S. EPA Region 8
1595 Wynkoop Street
Mail Code 8ENF-AT
Denver, CO 80202-1129

Applicable Requirements: NDAC 33.1-15-22-03, Subpart A and 40 CFR 63, Subpart ZZZZ

D. **Flare Restrictions**:

1) The stack height for the flare shall be at least 36 feet above ground level.

2) The flare must be equipped and operated with an automatic ignitor or a continuous burning pilot which must be maintained in good working order as outlined in NDAC 33.1-15-07-12.

3) The presence of a flame shall be monitored using a thermocouple or any other equivalent device approved by the Department.

Applicable Requirements: PTC11082 and NDAC 33.1-15-07-02

E. **Operations and Maintenance**: The system used to remove hydrogen sulfide from the digester gas prior to combustion as biogas in the boiler (EU B2) shall be operated in accordance with the manufacturer's recommended Operations and Maintenance (O&M) procedures or a site-specific O&M procedure developed from the manufacturer's recommended O&M procedures. The owner/operator shall maintain the O&M procedures onsite and shall provide the Department with a copy when requested.

Applicable Requirement: PTC11082

F. **Prevention of Significant Deterioration (PSD) Review**: This facility is exempt from PSD review due to fuel sulfur restrictions. Any relaxation in these limits that increases the potential to emit above the applicable PSD threshold of any contaminant in any 12-month period when normal operations (no malfunctions) occur will require a full PSD review of the source as though construction had not commenced on the source.

Applicable Requirement: NDAC 33.1-15-14-06.5.b(1)

G. **Like-Kind Engine Replacement:** This permit allows the permittee to replace the existing engines with a like-kind engine. Replacement is subject to the following conditions.

1) The Department must be notified within 10 days after change-out of the engine.

2) The replacement engine shall operate in the same manner, provide no increase in throughput and have equal or less emissions than the engine it is replacing.

3) The date of manufacture of the replacement engine must be included in the notification. The facility must comply with any applicable federal standards (e.g. NSPS, NESHAP, MACT) triggered by the replacement.

4) The replacement engine is subject to the same state emission limits as the existing engine in addition to any NSPS or MACT emission limit that is applicable.

Applicable Requirement: NDAC 33.1-15-14-06.5.b(1)

3. **Emission Unit Limits**:

A. **Emission Limits**:

Emission Unit Description	EU	EP	Pollutant/ Parameter	Emission Limit	NDAC Applicable Requirement
Boiler No. 1	B1	B1	PM [A]	0.80 lb/10^6 Btu	33.1-15-05-02.2.a
			Opacity	See Cond. 3.B.1	33.1-15-03-02
Boiler No. 2	B2	B2	PM [A]	0.80 lb/10^6 Btu	33.1-15-05-02.2.a
			SO_2 (biogas)	See Cond. 2.A	33.1-15-06-01.2
			Opacity	See Cond. 3.B.1	33.1-15-03-02
Boiler No. 3	B3	B3	PM [A]	0.46 lb/10^6 Btu	33.1-15-05-02.2.b
			Opacity	See Cond. 3.B.1	33.1-15-03-02
Line 1 process dryer	D1	D1A & D1B	PM [A]	0.50 lb/10^6 Btu	33.1-15-14-06.5.b(1)
			Opacity	See Cond. 3.B.1	33.1-15-03-02
Potato dryer	D4	D4A & D4B	PM [A]	1.0 lb/hr	~~33.1-15-14-06.5.b(1)~~Permit to Construct No. ACP-18187 v1.0 (PTC ACP-18187 v1.0)
			Opacity	See Cond. 3.B.1	PTC ACP 18187 v1.0 & 33.1-15-03-02
Line 2 retrograde dryer/cooler	D5	D5	Opacity	See Cond. 3.B.1	33.1-15-03-02
Line 1 potato fryer	PF1	PF1	PM [B]	4.0 lb/hr	33.1-15-02-04
Line 2 potato fryer	PF2		Opacity	See Cond. 3.B.1	33.1-15-03-02
~~Line 3 potato fryer~~	~~PF3~~	~~PF3~~	~~PM [A]~~	~~1.75 lb/hr~~	~~33.1-15-02-04~~
			~~Opacity~~	~~See Cond. 3.B.1~~	~~33.1-15-03-02~~
Line 4 potato fryer	PF4	PF4	PM [A]	~~3.20~~3.48 lb/hr	~~33.1-15-02-04~~PTC ACP 18187 v1.0
			Opacity	See Cond. 3.B.1	PTC ACP 18187 v1.0 & 33.1-15-03-02
Potato by-product dryers	F1 & F2	F1 & F2	PM [A]	1.5 lb/hr (each unit)	~~Permit to Construct No. 2/23/96 (~~PTC 2/23/96~~)~~
			Opacity	See Cond. 3.B.1	33.1-15-03-02
By-product cooler	F5	F5	PM [A]	0.075 lb/hr	PTC 2/23/96
			Opacity	See Cond. 3.B.1	33.1-15-03-02
Truck loadout	F8	F8	PM [A]	0.034 lb/hr	PTC 2/23/96
			Opacity	See Cond. 3.B.1	33.1-15-03-02

Emission Unit Description	EU	EP	Pollutant/ Parameter	Emission Limit	NDAC Applicable Requirement
Digester gas flare	FL1	FL1	SO_2	56.6 lb/hr (1-hr avg.)	PTC11082
			Opacity	See Cond. 3.B.2	33.1-15-03-03.1
Emergency diesel generator engine	E1	E1	Opacity	See Cond. 3.B.1	33.1-15-03-02
			Operating Hours	See Cond. 1 Footnote A	33.1-15-12-02, Subpart ZZZZ
Emergency diesel generator engine	E2	E2	Opacity	See Cond. 3.B.1	33.1-15-03-02
			Operating Hours	See Cond. 1 Footnote A	33.1-15-12-02, Subpart ZZZZ

A Filterable particulate matter.

B Total filterable particulate matter and condensable particulate matter.

B. **Opacity Limits**:

1) Twenty percent, except that a maximum of forty percent is permissible for not more than one six-minute period per hour. This standard applies at all times.

Applicable Requirement: NDAC 33.1-15-03-02

2) Twenty percent, except that a maximum of sixty percent is permissible for not more than one six-minute period per hour. This standard applies at all times.

Applicable Requirement: NDAC 33.1-15-03-03.1

4. **Monitoring Requirements and Conditions**:

A. **Requirements**:

Emission Unit Description	EU	Pollutant/ Parameter	Monitoring Requirement (Method)	Condition Number	NDAC Applicable Requirement
Boiler No. 1	B1	PM	Recordkeeping	4.B.2	33.1-15-14-06.5.a(3)(a)
		Opacity	Recordkeeping	4.B.2	33.1-15-14-06.5.a(3)(a)
Boiler No. 2	B2	PM	Recordkeeping	4.B.2	33.1-15-14-06.5.a(3)(a)
		SO_2 (biogas)	Fuel Type/ Calculation	2.A.2 & 4.B.3	PTC14003 & 33.1-15-14-06.5.a(3)(a)
		Opacity	Recordkeeping	4.B.2	33.1-15-14-06.5.a(3)(a)
		Monthly Fuel Usage	Monthly Fuel Usage	4.B. 1 & 4.B.6	33.1-15-12, Subpart Dc

Emission Unit Description	EU	Pollutant/ Parameter	Monitoring Requirement (Method)	Condition Number	NDAC Applicable Requirement
Boiler No. 3	B3	PM	Recordkeeping	4.B.2	33.1-15-14-06.5.a(3)(a)
		Opacity	Recordkeeping	4.B.2	33.1-15-14-06.5.a(3)(a)
		Monthly Fuel Usage	Monthly fuel usage	4.B.1 & 4.B.6	33.1-15-12, Subpart Dc
Line 1process dryer	D1	PM/Opacity	Recordkeeping	4.B.2	33.1-15-14-06.5.a(3)(a)
Potato dryer	D4	PM/Opacity	Recordkeeping	4.B.2	33.1-15-14-06.5.a(3)(a)
Line 2 retrograde dryer/cooler	D5	Opacity	Recordkeeping	4.B.2	33.1-15-14-06.5.a(3)(a)
Line 1 potato fryer	PF1	PM/Opacity	O&M Plan/Visible Emissions Observations (VEO), WESP Oper. Voltage Measurements & Testing	4.B.4, 4.B.5 & 4.B.7	33.1-15-14-06.5.a(3)(a)
Line 2 potato fryer	PF2				
~~Line 3 potato fryer~~	~~PF3~~	~~PM/Opacity~~	~~O&M Plan/VEO~~	~~4.B.4 & 4.B.5~~	~~33.1-15-14-06.5.a(3)(a)~~
Line 4 potato fryer	PF4	PM/Opacity	O&M Plan/VEO	4.B.4, & 4.B.5~~, & 4.B.7~~	33.1-15-14-06.5.a(3)(a)
Potato by-product dryers	F1 & F2	PM/Opacity	O&M Plan/VEO	4.B.4 & 4.B.5	33.1-15-14-06.5.a(3)(a)
By-product cooler	F5	PM/Opacity	O&M Plan/VEO	4.B.2	33.1-15-14-06.5.a(3)(a)
Truck loadout	F8	PM/Opacity	O&M Plan/VEO	4.B.4 & 4.B.5	33.1-15-14-06.5.a(3)(a)
Digester gas flare	FL1	SO_2	Calculation	4.B.8	PTC11082
		Opacity	Recordkeeping	4.B.2	33.1-15-14-06.5.a(3)(a)
Emergency generator engine	E1	Opacity	Recordkeeping	4.B.-2	33.1-15-14-06.5.a(3)(a)
		Operating Hours	Recordkeeping	4.B.9	33.1-15-12, Subpart IIII
Emergency generator engine	E2	Opacity	Recordkeeping	4.B.2	33.1-15-14-06.5.a(3)(a)
		Operating Hours	Recordkeeping	4.B.9	33.1-15-12, Subpart IIII

B. **Monitoring Conditions**:

1) The monitoring shall be in accordance with the following applicable requirements of NDAC 33.1-15-12.

   a) 40 CFR, Subpart A, §60.13, Monitoring Requirements.

   b) 40 CFR, Subpart Dc, §60.46c, Emission monitoring for sulfur dioxide.

2) For purposes of compliance monitoring, burning of fuels outlined in Condition 2.A Fuel Restrictions shall be considered credible evidence of compliance with any applicable opacity, particulate and SO_2 emission limit. However, results from tests conducted in accordance with the test methods in 40 CFR 50, 51, 60, 61, or 75 will take precedence over the burning of natural gas, propane or biogas for evidence of compliance or noncompliance with any applicable opacity, particulate and SO_2 emission limit, in the event of enforcement action.

3) The permittee shall calculate sulfur dioxide emission rates from the sulfur content of the biogas using EPA emission factors or other methods approved by the Department. Pipeline quality natural gas and commercial propane are presumed to contain negligible amounts of sulfur, and therefore, no sulfur analysis of these fuels is required.

4) The permittee shall maintain and operate air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. The manufacturer's recommended Operations and Maintenance (O&M) procedures, or a site-specific O&M procedure (developed from the manufacturer's recommended O&M procedure), shall be followed to assure proper operation and maintenance of the equipment. The permittee shall have the O&M plan available on-site and provide the Department with a copy when requested.

5) At least once per week in which the emission unit is operated, a company representative (need not be certified) shall observe the emission point. If no visible emissions are observed, the date and time shall be recorded.

   If visible emissions are observed, the permittee must investigate the problem within eight hours. Any problems that are discovered must be corrected as soon as possible. If the correction of the emissions is expected to take longer than 24 hours, the permittee shall follow procedures as outlined in Condition 7.G. Following corrective maintenance, a visible emissions observation shall be made.

   All investigations of malfunctions and visible emissions shall be recorded. The permittee shall comply with the visible emissions and particulate emission limits and nothing in this condition shall be construed as authorizing otherwise.

6) As required by 40 CFR, Subpart Dc, §60.48c, Reporting and recordkeeping requirements, the owner or operator shall record and maintain records of the amounts of each fuel combusted during each month for EU B2 and B3.

7) WESP:

a) The WESP operating voltage (secondary voltage) for the Line 1 and Line 2 potato fryers shall be maintained at a minimum of 44 kV, based on a daily block average. The daily block average shall be established using a minimum of one voltage reading per hour. The permittee shall notify the Department as soon as possible during normal working hours if the daily block average for operating voltage (secondary voltage) drops below 44 kV.

b) During the final two years of the 5-year permit period, prior to submitting each Title V permit renewal application, the permittee shall conduct a stack test on the WESP for the Line 1 and Line 2 potato fryers to ensure compliance with the emission limit for PM. Any resulting changes to the WESP operating voltage will be submitted as a part of the Title V renewal application. The permittee may conduct a performance test at any time to establish a new minimum operating voltage.

8) Digester Flare Emission Calculation: During each occurrence of flaring, the permittee shall calculate and record the SO_2 emission rate (lb/hr) based on the H_2S content and quantity of gas flared. If any calculated exceedance of the SO_2 emission rate for the flare occurs, the exceedance shall be reported to the Department within 10 working days.

9) A log shall be kept of the total hours of operation on a calendar year basis using a non-resettable hour meter. Records shall be maintained to differentiate annual emergency vs. non-emergency hours of operation.

Collect operational and maintenance data to demonstrate that the facility complies with the engine manufacturer's emission-related written instructions [40 CFR 60.4211(a)].

5. **Recordkeeping Requirements**:

A. The permittee shall maintain compliance monitoring records as outlined in the Monitoring Records table that include the following information.

1) The date, place (as defined in the permit) and time of sampling or measurement.

2) The date(s) testing was performed.

3) The company, entity, or person that performed the testing.

4) The testing techniques or methods used.

5) The results of such testing.

6) The operating conditions that existed at the time of sampling or measurement.

7) The records of quality assurance for emissions measuring systems including but not limited to quality control activities, audits and calibration drifts as required by the applicable test method.

8) A copy of all field data sheets from the emissions testing.

9) A record shall be kept of all maintenance activities conducted on the emission units or air pollution control equipment.

10) Records shall be kept as to the type of fuel usage.

11) Engine operating hours differentiated by emergency vs. non-emergency and information to demonstrate compliance with the manufacturer's emission-related written instructions.

Applicable Requirement: NDAC 33.1-15-14-06.5.a(3)(b)[1] and NDAC 33.1-15-12-02, Subpart IIII

Monitoring Records

Emission Unit Description	EU	Pollutant/ Parameter	Compliance Monitoring Record
Boiler No. 1	B1	PM	Type of Fuel Usage
		Opacity	Type of Fuel Usage
Boiler No. 2	B2	PM	Type of Fuel Usage
		SO_2 (biogas)	Type of Fuel Usage/Calculation
		Opacity	Type of Fuel Usage
		Monthly Fuel Usage	Monthly Fuel Usage
Boiler No. 3	B3	PM	Type of Fuel Usage
		Opacity	Type of Fuel Usage
		Monthly Fuel Usage	Monthly Fuel Usage
Line 1 process dryer	D1	PM/Opacity	Type of Fuel Usage
Potato dryer	D4	PM/Opacity	Type of Fuel Usage
Line 2 retrograde dryer/cooler	D5	PM/Opacity	O&M Data/VEO Data
Line 1 potato fryer	PF1	PM/Opacity	O&M Data/VEO Data/WESP Operating Voltage and Test Data
Line 2 potato fryer	PF2		
~~Line 3 potato fryer~~	~~PF3~~	~~PM/Opacity~~	~~O&M Data/VEO Data~~
Line 4 potato fryer	PF4	PM/Opacity	O&M Data/VEO Data
Potato by-product dryers	F1 & F2	PM/Opacity	O&M Data/VEO Data
By-product cooler	F5	PM/Opacity	O&M Data/VEO Data

Emission Unit Description	EU	Pollutant/ Parameter	Compliance Monitoring Record
Truck loadout	F8	PM/Opacity	O&M Data/VEO Data
Rail loadout	F9	PM/Opacity	O&M Data/VEO Data
Digester gas flare	FL1	SO_2 Opacity	Calculation Type of Fuel Usage
Emergency generator engine	E1	Opacity Operating Hours	Type of Fuel Usage Hours of Operation Data
Emergency generator engine	E2	Opacity Operating Hours	Type of Fuel Usage Hours of Operation Data

B. In addition to requirements outlined in Condition 6.A, recordkeeping for EU B2 and B3 shall be in accordance with 40 CFR, Subpart A, §60.7, Notification and Recordkeeping and 40 CFR Subpart Dc, §60.48c, Reporting and Recordkeeping Requirements.

Applicable Requirement: NDAC 33.1-15-12

C. The permittee shall retain records of all required monitoring data and support information for a period of at least five years from the date of the monitoring sampling, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings/computer printouts of continuous monitoring instrumentation, and copies of all reports required by the permit.

Applicable Requirement: NDAC 33.1-15-14-06.5.a(3)(b)[2]

6. **Reporting**:

A. For EUs B2 and B3, reporting shall be in accordance with the following applicable requirements of NDAC 33.1-15-12.

1) 40 CFR, Subpart A, §60.7, Notification and Recordkeeping.

2) 40 CFR, Subpart Dc, §60.48c, Reporting and Recordkeeping Requirements.

Applicable Requirements: NDAC 33.1-15-12, Subparts A and Dc

B. The permittee shall submit a semi-annual monitoring deviation report for all monitoring records required under Condition 5 on forms supplied or approved by the Department. All instances of deviations from the permit must be identified in the report. A monitoring report shall be submitted within 45 days after June 30 and December 31 of each year.

Applicable Requirements: NDAC 33.1-15-14-06.5.a(3)(c)[1] and [2]

C. The permittee shall submit an annual compliance certification report in accordance with NDAC 33.1-15-14-06.5.c(5) within 45 days after December 31 of each year on forms supplied or approved by the Department.

Applicable Requirement: NDAC 33.1-15-14-06.5.c(5)

D. For emission units where the method of compliance monitoring is demonstrated by an EPA Test Method or a portable analyzer test, the test report shall be submitted to the Department within 60 days after compliance of the test.

Applicable Requirement: NDAC 33.1-15-14-06.5.a(6)(3)

E. The permittee shall submit an annual emission inventory report on forms supplied or approved by the Department. This report shall be submitted by March 15 of each year. Insignificant units/activities listed in this permit do not need to be included in the report.

Applicable Requirements: NDAC 33.1-15-14-06.5.a(7) and NDAC 33.1-15-23-04

7. **Facility Wide Operating Conditions**:

A. **Ambient Air Quality Standards**:

1) Particulate and gases. The permittee shall not emit air contaminants in such a manner or amount that would violate the standards of ambient air quality listed in Table 1 of NDAC 33.1-15-02, external to buildings, to which the general public has access.

2) Radioactive substances. The permittee shall not release into the ambient air any radioactive substances exceeding the concentrations specified in NDAC 33.1-10.

3) Other air contaminants. The permittee shall not emit any other air contaminants in concentrations that would be injurious to human health or well-being or unreasonably interfere with the enjoyment of property or that would injure plant or animal life.

4) Disclaimer. Nothing in any other part or section of this permit may in any manner be construed as authorizing or legalizing the emission of air contaminants in such manner that would violate the standards in Paragraphs 1), 2) and 3) of this condition.

Applicable Requirements: NDAC 33.1-15-02-04 and 40 CFR 50.1(e)

B. **Fugitive Emissions**: The release of fugitive emissions shall comply with the applicable requirements in NDAC 33.1-15-17.

Applicable Requirement: NDAC 33.1-15-17

C. **Open Burning**: The permittee may not cause, conduct, or permit open burning of refuse, trade waste, or other combustible material, except as provided for in Section 33.1-15-04-02 and may not conduct, cause, or permit the conduct of a salvage operation by open burning. Any permissible open burning under NDAC 33.1-15-04-02 must comply with the requirements of that section.

Applicable Requirement: NDAC 33.1-15-04

D. **Asbestos Renovation or Demolition**: Any asbestos renovation or demolition at the facility shall comply with emission standard for asbestos in NDAC 33.1-15-13.

Applicable Requirement: NDAC 33.1-15-13-02

E. **Requirements for Organic Compounds Gas Disposal**:

1) Any organic compounds, gases and vapors which are generated as wastes as the result of storage, refining or processing operations and which contain hydrogen sulfide shall be incinerated, flared or treated in an equally effective manner before being released into the ambient air.

2) Each flare must be equipped and operated with an automatic ignitor or a continuous burning pilot.

Applicable Requirement: NDAC 33.1-15-07-02

F. **Rotating Pumps and Compressors**: All rotating pumps and compressors handling volatile organic compounds must be equipped and operated with properly maintained seals designed for their specific product service and operating conditions.

Applicable Requirement: NDAC 33.1-15-07-01.5

G. **Shutdowns/Malfunction/Continuous Emission Monitoring System Failure**:

1) Maintenance Shutdowns. In the case of shutdown of air pollution control equipment for necessary scheduled maintenance, the intent to shut down such equipment shall be reported to the Department at least 24 hours prior to the planned shutdown provided that the air contaminating source will be operated while the control equipment is not in service. Such prior notice shall include the following:

a) Identification of the specific facility to be taken out of service as well as its location and permit number.

b) The expected length of time that the air pollution control equipment will be out of service.

c) The nature and estimated quantity of emissions of air pollutants likely to be emitted during the shutdown period.

d) Measures, such as the use of off-shift labor and equipment, that will be taken to minimize the length of the shutdown period.

e) The reasons that it would be impossible or impractical to shutdown the source operation during the maintenance period.

f) Nothing in this subsection shall in any manner be construed as authorizing or legalizing the emission of air contaminants in excess of the rate allowed by this article or a permit issued pursuant to this article.

Applicable Requirement: NDAC 33.1-15-01-13.1

2) Malfunctions.

a) When a malfunction in any installation occurs that can be expected to last longer than 24 hours and cause the emission of air contaminants in violation of this article or other applicable rules and regulations, the person responsible for such installation shall notify the Department of such malfunction as soon as possible during normal working hours. The notification must contain a statement giving all pertinent facts, including the estimated duration of the breakdown. The Department shall be notified when the condition causing the malfunction has been corrected.

b) Immediate notification to the Department is required for any malfunction that would threaten health or welfare or pose an imminent danger. During normal working hours the Department can be contacted at 701-328-5188. After hours the Department can be contacted through the 24-hour state radio emergency number 1-800-472-2121. If calling from out of state, the 24-hour number is 701-328-9921.

c) Unavoidable Malfunction. The owner or operator of a source who believes any excess emissions resulted from an unavoidable malfunction shall submit a written report to the Department which includes evidence that:

[1] The excess emissions were caused by a sudden, unavoidable breakdown of technology that was beyond the reasonable control of the owner or operator.

[2] The excess emissions could not have been avoided by better operation and maintenance, did not stem from an activity or event that could have been foreseen and avoided, or planned for.

[3] To the extent practicable, the source maintained and operated the air pollution control equipment and process equipment in a manner consistent with good practice for minimizing emissions, including minimizing any bypass emissions.

[4] Any necessary repairs were made as quickly as practicable, using off-shift labor and overtime as needed and possible.

[5] All practicable steps were taken to minimize the potential impact of the excess emissions on ambient air quality.

[6] The excess emissions are not part of a recurring pattern that may have been caused by inadequate operation or maintenance, or inadequate design of the malfunctioning equipment.

The report shall be submitted within 30 days of the end of the calendar quarter in which the malfunction occurred or within 30 days of a written request by the Department, whichever is sooner.

The burden of proof is on the owner or operator of the source to provide sufficient information to demonstrate that an unavoidable equipment malfunction occurred. The Department may elect not to pursue enforcement action after considering whether excess emissions resulted from an unavoidable equipment malfunction. The Department will evaluate, on a case-by-case basis, the information submitted by the owner or operator to determine whether to pursue enforcement action.

Applicable Requirement: NDAC 33.1-15-01-13.2

3) Continuous Emission Monitoring System Failures. When a failure of a continuous emission monitoring system occurs, an alternative method for measuring or estimating emissions must be undertaken as soon as possible. The owner or operator of a source that uses an alternative method shall have the burden of demonstrating that the method is accurate. Timely repair of the emission monitoring system must be made. The provisions of this subsection do not apply to sources that are subject to monitoring requirements in NDAC 33.1-15-21 (40 CFR 75, Acid Rain Program).

Applicable Requirement: NDAC 33.1-15-01-13.3

H. **Noncompliance Due to an Emergency**: The permittee may seek to establish that noncompliance with a technology-based emission limitation under this permit was due to an emergency. To do so, the permittee shall demonstrate the affirmative defense of emergency through properly signed, contemporaneous operating logs, or other relevant evidence that:

1) An emergency occurred, and that the permittee can identify the cause(s) of the emergency;

2) The permitted facility was at the time being properly operated;

3) During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards, or other requirements in this permit; and

4) The permittee submitted notice of the emergency to the Department within one working day of the time when emission limitations were exceeded longer than 24-hours due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. Those emergencies not reported within one working day, as well as those that were, will be included in the semi-annual report.

In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.

Technology-based emission limits are those established on the basis of emission reductions achievable with various control measures or process changes (e.g., a New Source Performance Standard) rather than those established to attain a health-based air quality standard.

An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of this source, including acts of God, which requires immediate corrective action to restore normal operation, and that causes this source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

Applicable Requirement: NDAC 33.1-15-14-06.5.g

I. **Air Pollution from Internal Combustion Engines**: The permittee shall comply with all applicable requirements of NDAC 33.1-15-08-01 – Internal Combustion Engine Emissions Restricted.

Applicable Requirement: NDAC 33.1-15-08-01

J. **Prohibition of Air Pollution**:

1) The permittee shall not permit or cause air pollution, as defined in NDAC 33.1-15-01-04.

2) Nothing in any other part of this permit or any other regulation relating to air pollution shall in any manner be construed as authorizing or legalizing the creation or maintenance of air pollution.

Applicable Requirement: NDAC 33.1-15-01-15

K. **Performance Tests**:

1) The Department may reasonably require the permittee to make or have made tests, at a reasonable time or interval, to determine the emission of air contaminants from any source, for the purpose of determining whether the permittee is in violation of any standard or to satisfy other requirements of NDCC 23.1-06. All tests shall be made, and the results calculated in accordance with test procedures approved or specified by the Department

including the North Dakota Department of Environmental Quality Emission Testing Guideline. All tests shall be conducted by reputable, qualified personnel. The Department shall be given a copy of the test results in writing and signed by the person responsible for the tests.

2) The Department may conduct tests of emissions of air contaminants from any source. Upon request of the Department, the permittee shall provide necessary and adequate access into stacks or ducts and such other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices, as may be necessary for proper determination of the emission of air contaminants.

Applicable Requirement: NDAC 33.1-15-01-12

3) Except for sources subject to 40 CFR 63, the permittee shall notify the Department by submitting a Proposed Test Plan, or its equivalent, at least 30 calendar days in advance of any tests of emissions of air contaminants required by the Department. The permittee shall notify the Department at least 60 calendar days in advance of any performance testing required under 40 CFR 63, unless otherwise specified by the subpart. If the permittee is unable to conduct the performance test on the scheduled date, the permittee shall notify the Department as soon as practicable when conditions warrant and shall coordinate a new test date with the Department.

Failure to give the proper notification may prevent the Department from observing the test. If the Department is unable to observe the test because of improper notification, the test results may be rejected.

Applicable Requirements: NDAC 33.1-15-14-06.5.a(3)(a), NDAC 33.1-15-12-02 Subpart A (40 CFR 60.8), NDAC 33.1-15-13-01.2 Subpart A (40 CFR 61.13), NDAC 33.1-15-22-03 Subpart A (40 CFR 63.7)

L. **Pesticide Use and Disposal**: Any use of a pesticide or disposal of surplus pesticides and empty pesticide containers shall comply with the requirements in NDAC 33.1-15-10.

Applicable Requirements: NDAC 33.1-15-10-01 and NDAC 33.1-15-10-02

M. **Air Pollution Emergency Episodes**: When an air pollution emergency episode is declared by the Department, the permittee shall comply with the requirements in NDAC 33.1-15-11.

Applicable Requirements: NDAC 33.1-15-11-01 through NDAC 33.1-15-11-04

N. **Stratospheric Ozone Protection**: The permittee shall comply with any applicable standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, except as provided for MVACs in Subpart B:

1) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to Section 82.156.

2) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to Section 82.158.

3) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to Section 82.161.

4) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to Section 82.156.

Applicable Requirement: 40 CFR 82

O. **Chemical Accident Prevention**: The permittee shall comply with all applicable requirements of Chemical Accident Prevention pursuant to 40 CFR 68. The permittee shall comply with the requirements of this part no later than the latest of the following dates:

1) Three years after the date on which a regulated substance is first listed under this part; or

2) The date on which a regulated substance is first present above a threshold quantity in a process.

Applicable Requirement: 40 CFR 68

P. **Air Pollution Control Equipment**: The permittee shall maintain and operate air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. The manufacturer's recommended Operations and Maintenance (O&M) procedures, or a site-specific O&M procedure developed from the manufacturer's recommended O&M procedures, shall be followed to assure proper operation and maintenance of the equipment. The permittee shall have the O&M procedures available onsite and provide the Department with a copy when requested.

Applicable Requirement: NDAC 33.1-15-14-06.5.b(1)

Q. **Prevention of Significant Deterioration of Air Quality** (40 CFR 52.21 as incorporated by NDAC Chapter 33.1-15-15): If this facility is classified as a major stationary source under the Prevention of Significant Deterioration of Air Quality (PSD) rules, a Permit to Construct must be obtained from the Department for any project which meets the definition of a "major modification" under 40 CFR 52.21(b)(2).

If this facility is classified as a major stationary source under the PSD rules and the permittee elects to use the method specified in 40 CFR 52.21(b)(41)(ii)(a) through (c) for calculating the projected actual emissions of a proposed project, then the permittee shall comply with all applicable requirements of 40 CFR 52.21(r)(6).

Applicable Requirement: NDAC 33.1-15-15-01.2

8. **General Conditions**:

A. **Annual Fee Payment**: The permittee shall pay an annual fee, for administering and monitoring compliance, which is determined by the actual annual emissions of regulated contaminants from the previous calendar year. The Department will send a notice, identifying the amount of the annual permit fee, to the permittee of each affected installation. The fee is due within 60 days following the date of such notice. Any source that qualifies as a "small business" may petition the Department to reduce or exempt any fee required under this section. Failure to pay the fee in a timely manner or submit a certification for exemption may cause this Department to initiate action to revoke the permit.

Applicable Requirements: NDAC 33.1-15-14-06.5.a(7) and NDAC 33.1-15-23-04

B. **Permit Renewal and Expiration**: This permit shall be effective from the date of its issuance for a fixed period of five years. The permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least six months, but no more than 18 months, prior to the date of permit expiration. The Department shall approve or disapprove the renewal application within 60 days of receipt. Unless the Department requests additional information or otherwise notifies the applicant of incompleteness, the application shall be deemed complete. For timely and complete renewal applications for which the Department has failed to issue or deny the renewal permit before the expiration date of the previous permit, all terms and conditions of the permit, including any permit shield previously granted shall remain in effect until the renewal permit has been issued or denied. The application for renewal shall include the current permit number, description of any permit revisions and off-permit changes that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term.

Applicable Requirements: NDAC 33.1-15-14-06.4 and NDAC 33.1-15-14-06.6

C. **Transfer of Ownership or Operation**: This permit may not be transferred except by procedures allowed in Chapter 33.1-15-14 and is to be returned to the Department upon the destruction or change of ownership of the source unit(s), or upon expiration, suspension or revocation of this permit. A change in ownership or operational control of a source is treated as an administrative permit amendment if no other change in the permit is necessary and provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to the Department.

Applicable Requirement: NDAC 33.1-15-14-06.6.d

D. **Property Rights**: This permit does not convey any property rights of any sort, or any exclusive privilege.

Applicable Requirement: NDAC 33.1-15-14-06.5.a(6)(d)

E. **Submissions**:

1) Reports, test data, monitoring data, notifications, and requests for renewal shall be submitted to:

North Dakota Department of Environmental Quality
Division of Air Quality
918 E Divide Avenue, 2nd Floor
Bismarck, ND 58501-1947

2) Any document submitted shall be certified as being true, accurate, and complete by a responsible official.

Applicable Requirement: NDAC 33.1-15-14-06.4.d

F. **Right of Entry**: Any duly authorized officer, employee or agent of the North Dakota Department of Environmental Quality may enter and inspect any property, premise or place listed on this permit or where records are kept concerning this permit at any reasonable time for the purpose of ascertaining the state of compliance with this permit and the North Dakota Air Pollution Control Rules. The Department may conduct tests and take samples of air contaminants, fuel, processing material, and other materials which affect or may affect emissions of air contaminants from any source. The Department shall have the right to access and copy any records required by the Department's rules and to inspect monitoring equipment located on the premises.

Applicable Requirements: NDAC 33.1-15-14-06.5.c(2) and NDAC 33.1-15-01-06

G. **Compliance**: The permittee must comply with all conditions of this permit. Any noncompliance with a federally-enforceable permit condition constitutes a violation of the Federal Clean Air Act. Any noncompliance with any State enforceable condition of this permit constitutes a violation of NDCC Chapter 23.1-06 and NDAC 33.1-15. Violation of any condition of this permit is grounds for enforcement action, for permit termination, revocation and reissuance or modification, or for denial of a permit renewal application. Noncompliance may also be grounds for assessment of penalties under the NDCC 23.1-06. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

Applicable Requirements: NDAC 33.1-15-14-06.5.a(6)(a) and NDAC 33.1-15-14-06.5.a(6)(b)

H. **Duty to Provide Information**: The permittee shall furnish to the Department, within a reasonable time, any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. This includes instances where an alteration, repair, expansion, or change in method of operation of the source occurs. Upon request, the permittee shall also furnish to the Department copies of records that the permittee is required to keep by this permit, or for information claimed to be confidential, the permittee may furnish such recourse directly to the Department along with a claim of confidentiality. The permittee, upon becoming aware that any relevant facts were omitted, or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information. Items that warrant supplemental information submittal include, but are not limited to, changes in the ambient air boundary and changes in parameters associated with emission points (i.e., stack parameters). The permittee shall also provide additional information as necessary to address any requirements that

become applicable to the source after the date a complete renewal application was submitted but prior to release of a draft permit.

Applicable Requirements: NDAC 33.1-15-14-06.5.a(6)(e), NDAC 33.1-15-14-06.6.b(3) and NDAC 33.1-15-14-06.4.b

I. **Reopening for Cause**: The Department will reopen and revise this permit as necessary to remedy deficiencies in the following circumstances:

1) Additional applicable requirements under the Federal Clean Air Act become applicable to the permittee with a remaining permit term of three or more years. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the expiration date of this permit.

2) The Department or the United States Environmental Protection Agency determines that this permit contains a material mistake or inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.

3) The Department or the United States Environmental Protection Agency determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

4) Reopenings shall not be initiated before a notice of intent to reopen is provided to the permittee by the Department at least 30 days in advance of the date that this permit is to be reopened, except that the Department may provide a shorter time period in the case of an emergency. Proceedings to reopen and issue this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.

Applicable Requirement: NDAC 33.1-15-14-06.6.f

J. **Permit Changes**: The permit may be modified, revoked, reopened, and reissued or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Applicable Requirement: NDAC 33.1-15-14-06.5.a(6)(c)

K. **Off-Permit Changes**: A permit revision is not required for changes that are not addressed or prohibited by this permit, provided the following conditions are met:

1) No such change may violate any term or condition of this permit.

2) Each change must comply with all applicable requirements.

3) Changes under this provision may not include changes or activities subject to any requirement under Title IV or that are modifications under any provision of Title I of the Federal Clean Air Act.

4) A Permit to Construct under NDAC 33.1-15-14-02 has been issued, if required.

5) Before the permit change is made, the permittee must provide written notice to both the Department and Air Program (8P-AR), Office of Partnerships & Regulatory Assistance, US EPA Region 8, 1595 Wynkoop Street, Denver, CO 80202-1129, except for changes that qualify as insignificant activities in Section 33.1-15-14-06. This notice shall describe each change, the date of the change, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result.

6) The permittee shall record all changes that result in emissions of any regulated air pollutant subject to any applicable requirement not otherwise regulated under this permit, and the emissions resulting from those changes. The record shall reside at the permittee's facility.

Applicable Requirement: NDAC 33.1-15-14-06.6.b(3)

L. **Administrative Permit Amendments**: This permit may be revised through an administrative permit amendment, if the revision to this permit accomplishes one of the following:

1) Corrects typographical errors.

2) Identifies a change in the name, address or phone number of any person identified in this permit or provides a similar minor administrative change at the source.

3) Requires more frequent monitoring or reporting by the permittee.

4) Allows for a change in ownership or operational control of the source where the Department determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new permittee has been submitted to the Department.

5) Incorporates into the Title V permit the requirements from a Permit to Construct when the review was substantially equivalent to Title V requirements for permit issuance, renewal, reopenings, revisions and permit review by the United States Environmental Protection Agency and affected state review, that would be applicable to the change if it were subject to review as a permit modification and compliance requirements substantially equivalent to Title V requirements for permit content were contained in the Permit to Construct.

6) Incorporates any other type of change which the Administrator of the United States Environmental Protection Agency has approved as being an administrative permit amendment as part of the Department's approved Title V operating permit program.

Applicable Requirement: NDAC 33.1-15-14-06.6.d

M. **Minor Permit Modification**: This permit may be revised by a minor permit modification, if the proposed permit modification meets the following requirements:

1) Does not violate any applicable requirement.

2) Does not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in this permit.

3) Does not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis.

4) Does not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include a federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the Federal Clean Air Act; and alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the Federal Clean Air Act.

5) Is not a modification under NDAC 33.1-15-12, 33.1-15-13, and 33.1-15-15 or any provision of Title I of the Federal Clean Air Act.

6) Is not required to be processed as a significant modification.

Applicable Requirement: NDAC 33.1-15-14-06.6.e(1)

N. **Significant Modifications**:

1) Significant modification procedures shall be used for applications requesting permit modifications that do not qualify as minor permit modifications or as administrative amendments. Every significant change in existing monitoring permit terms or conditions and every relaxation of reporting or recordkeeping permit terms or conditions shall be considered significant. Nothing therein shall be construed to preclude the permittee from making changes consistent with this subsection that would render existing permit compliance terms and conditions irrelevant.

2) Significant permit modifications shall meet all Title V requirements, including those for applications, public participation, review by affected states, and review by the United States Environmental Protection Agency, as they apply to permit issuance and permit renewal. The Department shall complete review of significant permit modifications within nine months after receipt of a complete application.

Applicable Requirement: NDAC 33.1-15-14-06.6.e(3)

O. **Operational Flexibility**: The permittee is allowed to make a limited class of changes within the permitted facility that contravene the specific terms of this permit without applying for a permit revision, provided the changes do not exceed the emissions allowable under this permit, are not Title I modifications and a Permit to Construct is not required. This class of changes does not include changes that would violate applicable requirements; or changes to federally-enforceable permit terms or conditions that are monitoring, recordkeeping, reporting, or compliance certification requirements.

The permittee is required to send a notice to both the Department and Air Program (8P-AR), Office of Partnerships & Regulatory Assistance, US EPA Region 8, 1595 Wynkoop Street, Denver, CO 80202-1129, at least seven days in advance of any change made under this provision. The notice must describe the change, when it will occur and any change in emissions, and identify any permit terms or conditions made inapplicable as a result of the change. The permittee shall attach each notice to its copy of this permit. Any permit shield provided in this permit does not apply to changes made under this provision.

Applicable Requirement: NDAC 33.1-15-14-06.6.b(2)

P. **Relationship to Other Requirements**: Nothing in this permit shall alter or affect the following:

1) The provisions of Section 303 of the Federal Clean Air Act (emergency orders), including the authority of the administrator of the United States Environmental Protection Agency under that section.

2) 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.

3) The ability of the United States Environmental Protection Agency to obtain information from a source pursuant to Section 114 of the Federal Clean Air Act.

4) Nothing in this permit shall relieve the permittee of the requirement to obtain a Permit to Construct.

Applicable Requirements: NDAC 33.1-15-14-06.3 and NDAC 33.1-15-14-06.5.f(3)(a), (b) and (d)

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

Applicable Requirement: NDAC 33.1-15-14-06.5.a(5)

R. **Circumvention**: The permittee shall not cause or permit the installation or use of any device of any means which conceals or dilutes an emission of air contaminants which would otherwise violate this permit.

Applicable Requirement: NDAC 33.1-15-01-08

9. **State Enforceable Only Conditions (not Federally enforceable)**:

A. **General Odor Restriction**: The permittee shall not discharge into the ambient air any objectionable odorous air contaminant which exceeds the limits established in NDAC 33.1-15-16.

Applicable Requirement: NDAC 33.1-15-16

B. **Hydrogen Sulfide Restriction**: The permittee shall not discharge into the ambient air hydrogen sulfide (H_2S) in concentrations that would be objectionable on land owned or leased by the complainant or in areas normally accessed by the general public. For the purpose of complaint resolution, two samples with concentrations greater than 0.05 parts per million (50 parts per billion) sampled at least 15 minutes apart within a two-hour period and measured in accordance with Section 33.1-15-16-04 constitute a violation.

Applicable Requirement: NDAC 33.1-15-16-04

PERMIT APPLICATION FOR TITLE V PERMIT TO OPERATE

NORTH DAKOTA DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF AIR QUALITY
SFN 52858 (9-2021)

SECTION A - FACILITY INFORMATION

Name of Firm or Organization J. R. Simplot Company		
Responsible Person No Changes		
Title	Telephone Number	E-mail Address
Mailing Address (Street & Number)		
City	State ND	ZIP Code
Contact Person for Air Pollution Matters No Changes		
Title	Telephone Number	E-mail Address
Mailing Address (Street & Number)		
City	State	ZIP Code
Facility Name Grand Forks Potato Processing Plant		
Facility Address (Street & Number) No Changes		
City	State	ZIP Code
County	Latitude (decimal degrees)	Longitude (decimal degrees)

Legal Description of Facility Site				
Quarter	Quarter	Section	Township	Range
Land Area at Facility Site _____ Acres (or) _____ Sq. Ft.		MSL Elevation at Facility		

SECTION B – GENERAL NATURE OF BUSINESS

Describe Nature of Business	North American Industry Classification System Code (NAICS)	Standard Industrial Classification Code (SIC)
No Changes	No Changes	No Changes

SECTION C – GENERAL PERMIT INFORMATION

Type of Permit to Operate? ☐ Initial ☐ Minor Modification ☐ Significant Modification

If application is for renewal or revision of an existing Title V permit, please provide the following data:

Current Permit to Operate	Current Permit to Operate Expiration Date:
Number: T5-F76008 Renewal: 4 Revision: 0	07/06/2024

SECTION D – MINOR PERMIT MODIFICATION

Affected Emission Unit(s):	Description of Proposed Change:
N/A	N/A
Applicable Requirements (NSPS, PSD, etc.):	**Net Effect on Source Emissions**
N/A	Emission Unit(s): N/A Facility: N/A

Are you requesting that minor permit modification procedures be used in accordance with NDAC 33.1-15-14-06.e(1)(a)? ☐ Yes ☒ No

SECTION E – SOURCE IDENTIFICATION AND CATEGORY OF EACH SOURCE INCLUDED ON THIS PERMIT APPLICATION

Your Emission Unit Number	Emission Unit Description	New Emission Unit? (check if yes)	PTC Number/ ACP Number	Initial Application	Minor Modification	Significant Modification	Other	Explain if Other
D4	Natural gas/propane-fired potato dryer	☑	PTC No. ACP-18187 v1.0	☐	☐	☑	☐	
PF4	Line 4 potato fryer	☑	PTC No. ACP-18187 v1.0	☐	☐	☑	☐	
E2	150 kW Emergency Engine	☑	N/A	☐	☐	☐	☑	New Insignificant Unit
		☐		☐	☐	☐	☐	
		☐		☐	☐	☐	☐	
		☐		☐	☐	☐	☐	
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		☐		☐	☐	☐	☐	

Add additional pages if necessary

SECTION F1 – IDENTIFICATION OF AIR CONTAMINANTS

Check all which are emitted in measurable quantities into the atmosphere from any operation at facility

☐ Arsenic	☐ Chlorine Compounds	☒ Sulfur Compounds	☐ Radioisotopes
☐ Asbestos	☐ Chromium Compounds	☐ Hydrogen Sulfide	☐ Visible Emissions
☐ Beryllium	☐ Fluoride Compounds	☐ Odors	☒ Particulates (specify)
☐ Cadmium	☒ Volatile Organic Compounds	☒ Carbon Monoxide	☐ Dust
☒ Lead	☒ Other Organic Compounds	☒ Nitrogen Compounds	☐ Silica
☐ Mercury	☒ Greenhouse Gases (CO_2e)	☐ Pesticides	☐ Other (specify)

List Specific Compounds:

PM, PM10, PM2.5, Acetaldehyde, Acrolein, Benzene, Dichlorobenzene, Formaldehyde, Hexane, Naphthalene, Toluene, Xylenes, Total PAHs

SECTION F2 – IDENTIFICATION OF AIR CONTAMINANTS

Has emission unit testing been done at the facility? ☐ Yes ☒ No

Emission Unit No.	Last Date when a Testing Program was Completed	If Program is Continuous, Give Approximate Testing Frequency	Regulation requiring frequency (NSPS, MACT, Permit Requirement-list permit number)
N/A		N/A	N/A

Add additional pages if necessary

SECTION G1 – ADDITIONAL FORMS

Indicate which of the following forms are attached and made part of the application	
☒ Emission Unit Information (SFN 61006)	☐ Flexible Permits (SFN 61007)
☐ Compliance Schedule and Plan (SFN 61008)	☐ Potential To Emit Table

SECTION G2 – OTHER ATTACHMENTS INCLUDED AS PART OF THIS APPLICATION

1.	N/A	4.	
2.		5.	
3.		6.	

I, the undersigned applicant, am fully aware that statements made in this application and the attached exhibits and statements constitute the application for Permit to Operate Air Contaminant sources from the North Dakota Department of Environmental Quality and certify that the information in this application is true, correct and complete to the best of my knowledge and belief. Further, I agree to comply with the provisions of Chapter 23.1-06 of the North Dakota Century Code and all rules and regulations of the Department, or revisions thereof. I also understand the permit is nontransferable and, if granted a permit, I will promptly notify the Department upon sale or legal transfer of this permitted establishment.

Signature of Applicant	Date
	1/3/24

TITLE V PERMIT TO OPERATE - RENEWAL APPLICATION

NORTH DAKOTA DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF AIR QUALITY
SFN 52824 (9-2021)

In accordance with 33.1-15-14-04.c. of the North Dakota Air Pollution Control Rules, a Title V permit renewal application must be submitted to the Department at least six months, but no more than eighteen months, prior to the expiration date. Permit renewal applications are incomplete unless all information requested herein is supplied. The current Title V permit will be the baseline reference for this renewal. The requirements (40 CFR 70.5(c) & NDAC 33.1-15-14-06.4.c) to include a citation and description of all applicable requirements and a description of or reference to any applicable test method for determining compliance with each applicable requirement may be met by accomplishing either or both of the following: 1) enclose an annotated (red-lined) copy of the current permit indicating all changes needed to reflect the current facility configuration, applicable requirements and test methods; 2) enclose a narrative that conveys all changes needed to the current permit to reflect the current facility configuration, all applicable requirements and test methods.

FOR ACID RAIN UNITS ONLY – Submit with the Title V permit renewal application all Acid Rain renewal applications (the Acid Rain Permit Application, the Phase II NO_x Compliance Plan, and if applicable, the Phase II NO_x Averaging Plan).

PART 1. GENERAL APPLICATION INFORMATION

Owner's Name: J. R. Simplot Company

Facility Name: Grand Forks Potato Processing Plant

Name of Person Completing Application: Eric Halstenson Phone: (701) 780-7848

Title: Environmental Manager Email: Eric.Halstenson@simplot.com

Current Operating Permit Number: T5-F76008

Expiration Date of Current Operating Permit: 07 / 06 / 2024

PART 2. COMPLIANCE CERTIFICATION

A. Schedule for Submission of Compliance Certifications During the Term of the Permit

Frequency of Submittal	Date Beginning (month/day/year)
Annual	02/14/2025

B. Statement of Compliance with Compliance Assurance Monitoring (CAM) and Compliance Certification Requirements

The facility identified in this application is in compliance with applicable monitoring and compliance certification requirements.

- ☑ Yes
- ☐ No - Describe below which requirements are not being met:
- ☑ CAM not applicable

C. Certification of Compliance with all Applicable Requirements

This certification must be signed by a "responsible official" as defined in NDAC 33.1-15-14-06.1. Forms without a signed certification will be returned as incomplete.

Except for requirements identified in Compliance Schedule and Plan (Section G) of Title V Permit to Operate application forms for which compliance is not achieved, I hereby certify that, based on information and belief formed after reasonable inquiry, the air contaminant source identified in this form is in compliance with all applicable requirements.

Signed	Date 1/3/24
Typed Name David Valdez	

PART 3. STATUS OF SOURCE

Has there been any change to the source since the most recent initial or renewal permit application, minor permit modification, significant modification or administrative permit amendment?

☐ No ☑ Yes

If yes, complete and submit appropriate sections of Title V Permit to Operate application forms.

PART 4. CERTIFICATION OF TRUTH, ACCURACY AND COMPLETENESS

Note: This certification must be signed by a "responsible official" as defined in NDAC 33.1-15-14-06.1. Applications without a signed certification will be returned as incomplete.

I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained in this application are true, accurate and complete.

Name (typed) David Valdez

(Signed) _____ Date 1 / 3 / 24

Telephone Number (701) 780-7914

Send original renewal application to:

North Dakota Department of Environmental Quality
Division of Air Quality
4201 Normandy Street, 2nd Floor
Bismarck, ND 58503-1324
(701)328-5188

Send copy of renewal application to:

Air Program (8P-AR)
Office of Partnerships & Regulatory Assistance
US EPA Region 8
1595 Wynkoop Street
Denver, CO 80202-1129

INSTRUCTIONS

These instructions are intended to assist permit applicants in the completion of the enclosed forms with the degree of accuracy and detail necessary to allow the determination of whether to grant or deny a permit to operate an air contaminant source or modification.

All information included in the application, including maximum estimated emission rates, will be used to make the above determination. The information that is supplied in the application may be used to establish permit conditions. The emission rates provided should be based on the most credible data available. Although AP-42 provides general information, it should not be solely relied on to develop emission rates. Other sources of information that accurately represent the actual conditions that the emission unit will be operated under, such as actual test data or manufacturer's data, may be preferable.

For any air contaminant source or modification described in SFN 52858, SFN 61006 must also be must be completed and attached for each emission unit. For the facility's compliance schedule, SFN 61008 must be completed and submitted. If the facility requests a flexible permit SFN 61007, must be completed and submitted.

Those existing sources of air contaminants which are proven by the applicant to be designed or controlled so as to operate without emitting air contaminants in violation of air pollution rules and regulations will be granted a permit to operate.

Certain sizes and types of existing or new sources are exempted from the requirement to obtain a permit to continue operating or to construct. These sizes are specified in the instruction sheets for the relevant permit application forms or can be obtained by contacting the Department.

Any information included on the forms, other than emission data, that would divulge production or sales figures or methods, processes or production unique to such person or would otherwise tend to affect adversely the competitive position of such person by revealing trade secrets should be noted by inserting the word "confidential" in the margin next to the appropriate item. Any information, other than production figures, that is requested to be kept in confidence must be justified by a written statement setting forth the reasons for the request. All information not marked confidential will be available for public inspection.

These forms are intended to inform permit applicants of the type of information required in order that a permit to operate or construct be granted. It is not possible to design forms which are ideally suited to every conceivable operation. Permit applicants are encouraged to submit additional supplementary material when it is felt that the completion of these forms does not provide an adequate explanation of the operation.

It will be necessary to refer to the North Dakota Air Pollution Control Rules (Article 33.1-15 NDAC; online at www.legis.nd.gov/information/acdata/html/33.1-15.html), especially those parts which deal with the permit system and those chapters which specify emission limitations for each air contaminant, in order to satisfactorily complete a permit application. Electronic copies of air pollution control permit application forms are available online at www.deq.nd.gov/AQ/forms.aspx. Paper copies of all forms, as well as the rules, are available on request. To cover the costs of printing and postage, the charge for a copy of the North Dakota Air Pollution Control Rules is $15.00.

Applicants should contact the Department prior to preparation and submittal of an application to determine what additional information will be required for a particular source or modification and the method to be used in performing the analyses.

SEND COMPLETED APPLICATION AND ALL ATTACHMENTS TO:

North Dakota Department of Environmental Quality
Division of Air Quality
4201 Normandy Street, 2nd Floor
Bismarck, ND 58503-1324
(701) 328-5188

EMISSION UNIT FOR TITLE V PERMIT TO OPERATE

NORTH DAKOTA DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF AIR QUALITY
SFN 61006 (3-2019)

SECTION A – EQUIPMENT INFORMATION

Type of Unit or Process (rotary dryer, cupola furnace, crusher, pelletizer, engine, etc.)	Emission Unit Number:	Emission Point Number:
Emergency Engine	E2	E2
Make: Kohler	Model: 150REOZJF	Installation or manufacture date: 10/02/2019
Capacity (manufacturer's or designer's guaranteed maximum) 150 kW	Operating Capacity (specific units)	
Brief description of operation of unit or process: Tier 3-certified, 150 kW, 6.8 L displacement, emergency diesel engine to supply back-up power to high-bay freezer.		
Brief description of alternative operating scenario (see Section M1 & M2 to elaborate):	Alternative Emission Point:	

SECTION B –OPERATING SCHEDULE

Are you agreeing to a limit on the operating schedule for this unit? ☐Yes ■No

Hours Per Day	Days Per Week	Weeks Per Year	Peak Production Season (if any)	Dates of Annual Shutdown

SECTION C – PRODUCTION RATES (THROUGHPUT LIMITS)

Are you agreeing to a limit on the production for this unit? ☐Yes ■No (If No, show normal operating schedule.)

Material	Process Time Frame			Specify Units (tons, Btu, Gal., etc)
	Hour	Week	Year	
Diesel	11.7	As Needed	As Needed	Gallons

SECTION D1 – APPLICABLE REQUIREMENTS

Generally describe all applicable requirements.

Regulations (i.e. SIP, NESHAP, PSD, NSPS, etc)	Monitoring Requirements	Recordkeeping Requirements	Reporting Requirements	Testing Requirements	Applicable Emission Standards (include units)
NSPS IIII	15 ppm diesel fuel	Fuel purchase records		Engine Certification	Nonroad Tier 3 for all pollutants
NSPS IIII		Operating Hours			Opacity 40 CFR 89.113
NESHAP ZZZZ	NSPS IIII Requirements	NSPS IIII Requirements	NSPS IIII Requirements	NSPS IIII Requirements	NSPS IIII Requirements

SECTION D2 – IDENTIFICATION OF AIR CONTAMINANTS

Has emission unit testing been done at the facility? ☐ Yes ■ No

Emission Unit ID	Last Date when a Testing Program was Completed	If Program is Continuous, Give Approximate Testing Frequency	Regulation requiring frequency (NSPS, MACT, Permit Requirement-list permit number)

Add additional pages if necessary

SECTION E – PRODUCTS OF UNIT OR PROCESS

Include all, even those not usable because they do not meet specifications

Material	Hourly Process Weight (Pounds Per Hour)			Average Annual (Specify Units)	Intermittent Operation Only (Average Hours Per Week)
	Average	Maximum	Minimum		
Not Applicable					

SECTION F – FUELS USED

Coal (Tons/Yr)	% Sulfur	% Ash	Oil (Gal/Yr)	% Sulfur	Grade No.
N/A	N/A	N/A	149.1	0.0015	2
Natural Gas (Thousand CF/Yr)		LP Gas (Gal/Yr)		Other (Specify)	
N/A		N/A			

SECTION G – STACK PARAMETERS

List each pollutant separately.

Pollutant (use CAS for HAPs)	Stack Height (ft)	Stack Diameter (ft at top)	Gas Volume (ACFM)	Exit Temp (°F)	Gas Velocity (fps)
NOx	~6	0.32	1,197	950	61.4
CO	~6	0.32	1,197	950	61.4
SOx	~6	0.32	1,197	950	61.4
PM10	~6	0.32	1,197	950	61.4
Total HAPs	~6	0.32	1,197	950	61.4

Stack Base UTM Coordinate X:	Stack Base UTM Coordinate Y:
97°04'53.2"W	47°56'07.6"N

SECTION H – ALTERNATIVE STACK PARAMETERS

List each pollutant separately.

Pollutant (use CAS for HAPs)	Stack Height (ft)	Stack Diameter (ft at top)	Gas Volume (ACFM)	Exit Temp (°F)	Gas Velocity (fps)
N/A					

Stack Base UTM Coordinate X:	Stack Base UTM Coordinate Y:

SECTION I – AIR CONTAMINANTS EMITTED

Known or Suspected - Use emission rates after control equipment.

Pollutant (use CAS for HAPs)	Amount		Basis of Estimate (AP-42, testing, engineering estimate, etc)
	Pounds/Hr	Tons/Yr	
See EU E2 Potential Emissions Attached			

SECTION J1 – AIR POLLUTION CONTROL EQUIPMENT

Type: ☐ Cyclone ☐ Multiclone ☐ Baghouse ☐ Electrostatic Precipitator

☐ Wet Scrubber ☐ Spray Dryer ■ None

☐ Other – Specify: _____

Name of Manufacturer	Model Number	Date to Be Installed

Application: ☐ Boiler ☐ Kiln ☐ Engine

☐ Other – Specify: _____

Pollutants Removed				
Design Efficiency (%)				

Operating Efficiency (%)				
Describe method used to determine operating efficiency:				

SECTION J2 – GAS CONDITIONS

Gas Conditions	Inlet		Outlet	
Gas Volume (SCFM; 68°F; 14.7 psia)				
Gas Temperature (°F)				
Gas Pressure (in. H_2O)				
Gas Velocity (ft/sec)				
Pollutant Concentration (Specify pollutant and unit of concentration)	Pollutant	Unit of Concentration	Inlet	Outlet
Pressure drop through gas cleaning device (in. H_2O)				

Table 1
EU P4 Line 4 Potato Fryer
J.R. Simplot Grand Forks Plant
Grand Forks, North Dakota

WESP controlled Line 4 potato fryer permitted under PTC No. ACP-18187 v1.0

Parameter	Value
Annual Operating Hours	8,760 hours/year
Daily Operating Hours	24 hours/day
Processing Capacity	45,000.0 lbs/hour [a]

Pollutant	CAS No.	Emission Factor	Emission Rate		
			Hourly (lb/hr)	Daily (lb/day)	Annual (tpy)
Criteria Pollutant Emissions					
PM	--	3.48 lb/hr [b]	3.48	83.57	15.25
PM_{10}	--	3.48 lb/hr [b]	3.48	83.57	15.25
$PM_{2.5}$	--	3.48 lb/hr [b]	3.48	83.57	15.25
VOC	--	0.22 lb/M lb [c]	9.90	237.60	43.36

Notes:

[a] PTC No. ACP-18187 v1.0.

[b] PM based on controlled grain loading of 0.014 gr/dscf and 14,509 dscfm plus 100% safety factor. PM_{10} and $PM_{2.5}$ assumed equal to PM.

[c] Assume same hourly emission rate as previous potato fryer (EU P4) permitted under Title V Permit to Operate No. T5-F76008.

Table 2
EU D4 Potao Dryer Emissions
J.R. Simplot Grand Forks Plant
Grand Forks, North Dakota

Natural gas-fired potato dryer permitted under PTC No. ACP-18187 v1.0

Parameter	Value
Annual Operating Hours	8,760 hours/year
Daily Operating Hours	24 hours/day
Heat Input Capacity	9.65 MMBtu/hr [a]

Pollutant	CAS No.	Emission Factor	Emission Rate		
			Hourly (lb/hr)	Daily (lb/day)	Annual (tpy)
Criteria Pollutant Emissions					
NO_X	11104-93-1	0.098 lb/MMBtu [b]	0.9	22.7	4.14
CO	630-08-0	0.082 lb/MMBtu [b]	0.8	19.1	3.48
SO_2	7446-09-5	5.88E-04 lb/MMBtu [a]	0.0	0.1	0.02
PM	--	1.00 lb/hr [d]	1.00	24.0	4.38
PM_{10}	--	1.00 lb/hr [d]	1.00	24.0	4.38
$PM_{2.5}$	--	1.00 lb/hr [d]	1.00	24.0	4.38
VOC	--	5.39E-03 lb/MMBtu [c]	0.05	1.25	0.23
Lead	7439-92-1	4.90E-07 lb/MMBtu [c]	0.00	0.00	2.1E-05
Greenhouse Gas Emissions					
CO_2	124-38-9	118 lb/MMBtu [c]	1,135	27,247	4,973
CH_4	74-82-8	2.3E-03 lb/MMBtu [c]	0.022	0.522	9.5E-02
N_2O	10024-97-2	2.2E-03 lb/MMBtu [c]	0.0208	0.4995	9.1E-02
CO_2e	--	118 lb/MMBtu [e]	1,142	27,409	5,002
Hazardous Air Pollutant Emissions					
Benzene	71-43-2	2.06E-06 lb/MMBtu [f]	1.99E-05	4.77E-04	8.7E-05
Dichlorobenzene	25321-22-6	1.18E-06 lb/MMBtu [f]	1.14E-05	2.72E-04	5.0E-05
Formaldehyde	50-00-0	7.35E-05 lb/MMBtu [f]	7.10E-04	1.70E-02	3.1E-03
Hexane	110-54-3	1.76E-03 lb/MMBtu [f]	1.70E-02	4.09E-01	7.5E-02
Naphthalene	91-20-3	5.98E-07 lb/MMBtu [f]	5.8E-06	1.4E-04	2.5E-05
Toluene	108-88-3	3.33E-06 lb/MMBtu [f]	3.2E-05	7.7E-04	1.4E-04
Total PAHs	--	6.85E-07 lb/MMBtu [f]	6.6E-06	1.6E-04	2.9E-05
Total HAPs	--		1.78E-02	4.27E-01	7.8E-02

Notes:

[a] PTC No. ACP-18187 v1.0.

[b] AP-42, Chapter 1.4, Table 1.4-1. *Emission Factors for Nitrogen Oxides (NO_x) and Carbon Monoxide (CO) from Natural Gas Combustion* (07/98).

[c] AP-42, Chapter 1.4, Table 1.4-2. *Emission Factors for Criteria Pollutants and Greenhouse Gases from Natural Gas Combustion*

[d] Assume same hourly emission rate as previous potato dryer (EU D4) permitted under Title V Permit to Operate No. T5-F76008. PM_{10} and $PM_{2.5}$ assumed equal to PM.

[e] CO_2e calculated based on global warming potential for each greenhouse gas: CO_2 = 1; CH_4 = 25; and N_2O = 298 (40 CFR Part 98,

Table 1
EU E2 Emergency Generator
J.R. Simplot Grand Forks Plant
Grand Forks, North Dakota

Kohler 150 kW Diesel Emergency Generator

Parameter	Value	
Annual Operating Hours	100 hours/year	
Daily Operating Hours	60 min/day	
Engine Rating	201 HP	
Fuel Consumption Rate	11.7 gal/hr	a
Fuel Heat Content	138,000 Btu/gal	b
Heat Input Capacity	1.6 MMBtu/hr	

Pollutant	CAS No.	Emission Factor		Emission Rate		
				Hourly (lb/hr)	Daily (lb/day)	Annual (tpy)
Criteria Pollutant Emissions						
NO_X	11104-93-1	2.98 g/HP-hr	c	1.3	1.3	0.07
CO	630-08-0	2.61 g/HP-hr	c	1.16	1.16	0.058
SO_2	7446-09-5	0.0015 lb/MMBtu	d	0.0024	0.0024	1.2E-04
PM	--	0.15 g/HP-hr	c	0.07	0.07	0.0033
PM_{10}	--	0.15 g/HP-hr	c	0.07	0.07	0.0033
$PM_{2.5}$	--	0.15 g/HP-hr	c	0.07	0.07	0.0033
VOC	--	1.12 g/HP-hr	e	1.81	1.81	0.090
Greenhouse Gas Emissions						
CO_2	124-38-9	164 lb/MMBtu	f	265	265	13
CH_4	74-82-8	6.6E-03 lb/MMBtu	f	0.011	0.011	5.3E-04
N_2O	10024-97-2	1.3E-03 lb/MMBtu	f	0.0021	0.0021	1.1E-04
CO_2e	--	165 lb/MMBtu	g	266	266	13
Hazardous Air Pollutant Emissions						
Acetaldehyde	75-07-0	7.67E-04 lb/MMBtu	h	1.2E-03	1.2E-03	6.2E-05
Acrolein	107-02-8	9.25E-05 lb/MMBtu	h	1.5E-04	1.5E-04	7.5E-06
Benzene	71-43-2	9.33E-04 lb/MMBtu	h	0.0015	0.0015	7.5E-05
Formaldehyde	50-00-0	1.18E-03 lb/MMBtu	h	0.0019	0.0019	9.5E-05
Naphthalene	91-20-3	8.48E-05 lb/MMBtu	h	1.4E-04	1.4E-04	6.8E-06
Toluene	108-88-3	4.09E-04 lb/MMBtu	h	6.6E-04	6.6E-04	3.3E-05
Xylenes	1330-20-7	2.85E-04 lb/MMBtu	h	4.6E-04	4.6E-04	2.3E-05
Total PAHs	--	1.68E-04 lb/MMBtu	h	2.7E-04	2.7E-04	1.4E-05
Total HAPs	--			6.19E-03	6.19E-03	3.10E-04

Notes:

[a] Kohler Model 150REOZJF specifications sheet; highest fuel consumption rate provided.

[b] Default heating value for Distillate Fuel Oil No. 2 as listed in Table C-1 to of 40 CFR Part 98, Subpart C of part 98.

[c] NO_X, CO, and PM emission factors based on EPA Tier 3 Standards (40 CFR §89.112). NO_X is assumed to be equivalent to NMHC + NO_X emission factor. PM_{10} and $PM_{2.5}$ emissions factors assumed to be equivalent to PM.

[d] AP-42, Chapter 3.4, Table 3.4-1. Gaseous Emission Factors For Large Stationary Diesel and All Sationary Dual-Fuel Engines (10/96). Assumed ultra-low sulfur diesel fuel with 15 ppm sulfur.

[e] AP-42, Chapter 3.3, Table 3.3-1. *Emission Factors For Uncontrolled Gasoline and Diesel Industrial Engines* (10/96).

[f] 40 CFR 98, Subpart C, Table C-2, *Default CH^4 and N^2O Emission Factors for Various Types of Fuel*.

Table 4
Emissions Change Summary
J.R. Simplot Grand Forks Plant
Grand Forks, North Dakota

Pollutant	T5-F76008			Renewal Application			
	EU PF3 Line 3 Potato Fryer - Scrubber Controlled (tpy)	EU PF4 Line 4 Potato Fryer - Scrubber Controlled (tpy)	EU D4 Potato Dryer (tpy)	EU PF4 Line 4 Potato Fryer - WESP Controlled (tpy)	EU D4 Potato Dryer (tpy)	EU E2 Emergency Engine (tpy)	Net Change in PTE (tpy)
Criteria Pollutants							
PM	7.67	14.02	4.38	15.25	4.38	3.3E-03	-6.43
PM_{10}	7.67	14.02	4.38	15.25	4.38	3.3E-03	-6.43
$PM_{2.5}$	7.67	14.02	4.38	15.25	4.38	3.3E-03	-6.43
VOCs	5.01	43.36	0.64	43.36	0.23	0.090	-5.33
NO_x	--	--	11.59	--	4.14	0.07	-7.38
CO	--	--	9.74	--	3.48	5.8E-02	-6.20
SO_2	--	--	0.07	--	0.02	1.2E-04	-4.5E-02
Lead	--	--	--	--	2.1E-05	--	2.1E-05
Total HAPs	--	--	--	--	7.8E-02	3.1E-04	7.8E-02

Table 1
EU P4 Line 4 Potato Fryer
J.R. Simplot Grand Forks Plant
Grand Forks, North Dakota

WESP controlled Line 4 potato fryer permitted under PTC No. ACP-18187 v1

Parameter	Value
Annual Operating Hours	8,760 hours/year
Daily Operating Hours	24 hours/day
Processing Capacity	45,000 lbs/hour [a]

Pollutant	Uncontrolled PTE	
	Emission Factor	Annual Emissions (tpy)
Criteria Pollutant Emissions		
PM	18.60 lb/hr [b]	81.47
PM_{10}	18.60 lb/hr [b]	81.47
$PM_{2.5}$	18.60 lb/hr [b]	81.47

Notes:

[a] PTC No. ACP-18187 v1.0.

[b] PM based on WESP design drawing J203074-PFD-001 process gas particulate rate of 9.3 lb 100% safety factor. PM_{10} and $PM_{2.5}$ assumed equal to PM.

J.R. Simplot, Grand Forks
Estimated Net Emissions Changes

Replaced Existing Units

Emission Unit Description	Permit I.D.	Capacity		Pollutant	Emission Factor		Emissions (lb/hr)	Emissions (tpy)
Line 3 Potato Fryer - Scrubber Controlled	EU PF3	5,200	lb/hr	PM	1.75	lb/hr[a]	1.75	7.67
				PM_{10}	1.75	lb/hr[a,b]	1.75	7.67
				$PM_{2.5}$	1.75	lb/hr[a,b]	1.75	7.67
				VOC	0.22	lb/M lb[c]	1.144	5.01
Line 4 Potato Fryer - Scrubber Controlled	EU PF4	45,000	lb/hr	PM	3.20	lb/hr[a]	3.20	14.02
				PM_{10}	3.20	lb/hr[a,b]	3.20	14.02
				$PM_{2.5}$	3.20	lb/hr[a,b]	3.20	14.02
				VOC	0.22	lb/M lb[c]	9.9	43.36
Potato Dryer - Uncontrolled	EU D4	27	MMBtu/hr	PM	1.00	lb/hr[a]	1.00	4.38
				PM_{10}	1.00	lb/hr[a,b]	1.00	4.38
				$PM_{2.5}$	1.00	lb/hr[a,b]	1.00	4.38
				VOC	5.39E-03	lb/MMBtu[d]	0.15	0.64
				NO_x	9.80E-02	lb/MMBtu[d]	2.65	11.59
				CO	8.24E-02	lb/MMBtu[d]	2.22	9.74
				SO_2	5.88E-04	lb/MMBtu[d]	0.02	0.07

Proposed Units

Emission Unit Description	Permit I.D.	Capacity		Pollutant	Emission Factor		Emissions (lb/hr)	Emissions (tpy)
Line 4 Batter Applicator and Potato Fryer - WESP Controlled	EU PF4	45,000	lb/hr	PM	3.48	lb/hr[e]	3.48	15.25
				PM_{10}	3.48	lb/hr[e,b]	3.48	15.25
				$PM_{2.5}$	3.48	lb/hr[e,b]	3.48	15.25
				VOC	0.22	lb/M lb[f]	9.9	43.36
New Potato Dryer - Uncontrolled	EU D4	9.65	MMBtu/hr	PM	1.00	lb/hr[g]	1.00	4.38
				PM_{10}	1.00	lb/hr[b,g]	1.00	4.38
				$PM_{2.5}$	1.00	lb/hr[b,g]	1.00	4.38
				VOC	5.39E-03	lb/MMBtu[d]	0.05	0.23
				NO_x	9.80E-02	lb/MMBtu[d]	0.95	4.14
				CO	8.24E-02	lb/MMBtu[d]	0.79	3.48
				SO_2	5.88E-04	lb/MMBtu[d]	0.01	0.02

Notes:

[a] Air Pollution Control Permit to Operate T5-F76008.

[b] PM_{10} and $PM_{2.5}$ assumed equal to PM.

[c] VOC emission factor from 2014 emissions inventory for Grand Forks Facility

[d] AP-42, Chapter 1.4 - Natural Gas Combustion.

[e] PM based on controlled grain loading of 0.014 gr/dscf and 14,509 dscfm plus 100% safety factor

[f] Assume same hourly emission rate as existing potato fryer (EU PF4).

[g] Assume same hourly emission rate as the existing potato fryer (EU D4). This is conservative as the new dryer has a lower heat input capacity.

Emission Change

PM	-1.47	-6.43
PM_{10}	-1.47	-6.43
$PM_{2.5}$	-1.47	-6.43
VOC	-1.24	-5.42
NO_x	-1.70	-7.45
CO	-1.43	-6.26
SO_2	-0.01	-0.04