



AIR EMISSION PERMIT NO. 05700006- 003
Total Facility Oper. Permit - Reissuance

IS ISSUED TO

Lamb Weston/RDO Frozen

LAMB WESTON/RDO FROZEN

3704 Park Avenue South

Park Rapids, Hubbard County, Minnesota 56470

The emission units, control equipment and emission stacks at the stationary source authorized in this permit reissuance are as described in the Permit Applications Table.

This permit reissuance supersedes Air Emission Permit No. 05700006-002, and authorizes the Permittee to operate the stationary source at the address listed above unless otherwise noted in Table A. The Permittee must comply with all the conditions of the permit. Any changes or modifications to the stationary source must be performed in compliance with Minn. R. 7007.1150 to 7007.1500. Terms used in the permit are as defined in the state air pollution control rules unless the term is explicitly defined in the permit.

Unless otherwise indicated, all the Minnesota rules cited as the origin of the permit terms are incorporated into the SIP under 40 CFR § 52.1220, and as such as are enforceable by U.S. Environmental Protection Agency (EPA) Administrator or citizens under the Clean Air Act.

Permit Type: Federal; Pt 70/Limits to Avoid NSR

Operating Permit Issue Date: August 15, 2011

Expiration Date: August 15, 2016

All Title I Conditions do not expire.

Doni Volkmeier for

Don Smith, P.E., Manager
Air Quality Permits Section
Industrial Division

for Paul Aasen
Commissioner
Minnesota Pollution Control Agency

Permit Applications Table

Permit Type	Application Date	Permit Action
Total Facility Operating Permit - Reissuance	November 28, 2007; supplemented May 16, 2011	003
Notification of Replacement of Control Equipment	August 8, 2008	003

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NOTICE TO THE PERMITTEE:

Your stationary source may be subject to the requirements of the Minnesota Pollution Control Agency's (MPCA) solid waste, hazardous waste, and water quality programs. If you wish to obtain information on these programs, including information on obtaining any required permits, please contact the MPCA general information number at:

Metro Area	651-296-6300
Outside Metro Area	1-800-657-3864
TTY	651-282-5332

The rules governing these programs are contained in Minn. R. chs. 7000-7105. Written questions may be sent to: Minnesota Pollution Control Agency, 520 Lafayette Road North, St. Paul, Minnesota 55155-4194.

Questions about this air emission permit or about air quality requirements can also be directed to the telephone numbers and address listed above.

PERMIT SHIELD:

Subject to the limitations in Minn. R. 7007.1800, compliance with the conditions of this permit shall be deemed compliance with the specific provision of the applicable requirement identified in the permit as the basis of each condition. Subject to the limitations of Minn. R. 7007.1800 and 7017.0100, subp. 2, notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

FACILITY DESCRIPTION:

The stationary source is a potato processing plant in Park Rapids, Minnesota. The plant was constructed in 1981, and the present owner Lamb Weston/RDO Frozen purchased the plant in 1992 for the production of frozen french fries.

The primary emission sources at the facility are the four fryers, which are controlled by wet scrubbers, and three boilers which supply steam to the frozen french fry processing plant. The boilers can burn distillate oil, natural gas, and biogas generated by the facility. The largest boiler (EU001) is subject to NSPS Subpart Db, Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units. The two smaller boilers (EU002 and EU003) are subject to Minnesota Standards of Performance for Existing Indirect Heating Equipment. All three boilers are subject to 40 CFR Part 63, Subpart JJJJJ, National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers. Other facility equipment is subject to Minnesota Standards of Performance.

The facility also includes several emission units which are classified as insignificant activities. These are included in Appendix B to the permit.

TABLE A: LIMITS AND OTHER REQUIREMENTS

A-1 08/17/11

Facility Name: Lamb Weston/RDO Frozen

Permit Number: 05700006 - 003

Table A contains limits and other requirements with which your facility must comply. The limits are located in the first column of the table (What To do). The limits can be emission limits or operational limits. This column also contains the actions that you must take and the records you must keep to show that you are complying with the limits. The second column of Table A (Why to do it) lists the regulatory basis for these limits. Appendices included as conditions of your permit are listed in Table A under total facility requirements.

Subject Item: Total Facility

What to do	Why to do it
SOURCE-SPECIFIC REQUIREMENTS	hdr
Permit Appendix: This permit contains appendices as listed in the permit Table of Contents. The Permittee shall comply with all requirements contained in the appendices.	Minn. R. 7007.0800, subp. 2
This permit establishes limits on the facility to keep it a minor source under New Source Review. The Permittee cannot make any change at the source that would make the source a major source under New Source Review until a permit amendment has been issued. This includes changes that might otherwise qualify as insignificant modifications and minor or moderate amendments.	Title I Condition: To avoid classification as major source or modification under 40 CFR Section 52.21 and Minn. R. 7007.3000
The facility currently uses ozone-depleting substances as defined in 40 CFR pt. 82. Sections 601-618 of the 1990 Clean Air Act Amendments and 40 CFR pt. 82 may apply to your facility. Read Sections 601-618 and 40 CFR pt. 82 to determine all the requirements that apply to your facility.	40 CFR pt. 82
The Permittee may be required to submit a Risk Management Plan (RMP) under the federal rule, 40 CFR pt. 68. Each owner or operator of a stationary source, at which a regulated substance is present above a threshold quantity in a process, shall design and implement an accidental release prevention program. A complete RMP must be submitted to the RMP Reporting Center, PO Box 3346, Merrifield, VA 22116. RMP submittal information may be obtained at http://www.epa.gov/swercepp or by calling 1-800-424-9346. These requirements must be complied with no later than the latest of the following dates: (1) June 21, 1999; (2) Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or (3) The date on which a regulated substance is first present above a threshold quantity in a process.	40 CFR pt. 68
OPERATIONAL REQUIREMENTS	hdr
The Permittee shall comply with National Primary and Secondary Ambient Air Quality Standards, 40 CFR pt. 50, and the Minnesota Ambient Air Quality Standards, Minn. R. 7009.0010 to 7009.0080. Compliance shall be demonstrated upon written request by the MPCA.	40 CFR pt. 50; Minn. Stat. Section 116.07, subds. 4a & 9; Minn. R. 7007.0100, subp. 7(A), 7(L), & 7(M); Minn. R. 7007.0800, subps. 1, 2 & 4; Minn. R. 7009.0010-7009.0080
Circumvention: Do not install or use a device or means that conceals or dilutes emissions, which would otherwise violate a federal or state air pollution control rule, without reducing the total amount of pollutant emitted.	Minn. R. 7011.0020
Air Pollution Control Equipment: Operate all pollution control equipment whenever the corresponding process equipment and emission units are operated.	Minn. R. 7007.0800, subp. 2; Minn. R. 7007.0800, subp. 16(J)
Operation and Maintenance Plan: Retain at the stationary source an operation and maintenance plan for all air pollution control equipment. At a minimum, the O & M plan shall identify all air pollution control equipment and control practices and shall include a preventative maintenance program for the equipment and practices, a description of (the minimum but not necessarily the only) corrective actions to be taken to restore the equipment and practices to proper operation to meet applicable permit conditions, a description of the employee training program for proper operation and maintenance of the control equipment and practices, and the records kept to demonstrate plan implementation.	Minn. R. 7007.0800, subps. 14 and 16(J)
Operation Changes: In any shutdown, breakdown, or deviation the Permittee shall immediately take all practical steps to modify operations to reduce the emission of any regulated air pollutant. The Commissioner may require feasible and practical modifications in the operation to reduce emissions of air pollutants. No emissions units that have an unreasonable shutdown or breakdown frequency of process or control equipment shall be permitted to operate.	Minn. R. 7019.1000, subp. 4
Fugitive Emissions: Do not cause or permit the handling, use, transporting, or storage of any material in a manner which may allow avoidable amounts of particulate matter to become airborne. Comply with all other requirements listed in Minn. R. 7011.0150.	Minn. R. 7011.0150
Noise: The Permittee shall comply with the noise standards set forth in Minn. R. 7030.0010 to 7030.0080 at all times during the operation of any emission units. This is a state only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act.	Minn. R. 7030.0010 - 7030.0080
Inspections: The Permittee shall comply with the inspection procedures and requirements as found in Minn. R. 7007.0800, subp. 9(A).	Minn. R. 7007.0800, subp. 9(A)

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-2**

08/17/11

Facility Name: Lamb Weston/RDO Frozen

Permit Number: 05700006 - 003

The Permittee shall comply with the General Conditions listed in Minn. R. 7007.0800, subp. 16.	Minn. R. 7007.0800, subp. 16
PERFORMANCE TESTING	hdr
Performance Testing: Conduct all performance tests in accordance with Minn. R. ch. 7017 unless otherwise noted in Tables A, B, and/or C.	Minn. R. ch. 7017
Performance Test Notifications and Submittals: Performance Tests are due as outlined in Table A of the permit. See Table B for additional testing requirements. Performance Test Notification (written): due 30 days before each Performance Test Performance Test Plan: due 30 days before each Performance Test Performance Test Pre-test Meeting: due 7 days before each Performance Test Performance Test Report: due 45 days after each Performance Test Performance Test Report - Microfiche Copy: due 105 days after each Performance Test The Notification, Test Plan, and Test Report may be submitted in alternative format as allowed by Minn. R. 7017.2018.	Minn. R. 7017.2018; Minn. R. 7017.2030, subps. 1-4, Minn. R. 7017.2035, subps. 1-2
Limits set as a result of a performance test (conducted before or after permit issuance) apply until superseded as stated in the MPCA's Notice of Compliance letter granting preliminary approval. Preliminary approval is based on formal review of a subsequent performance test on the same unit as specified by Minn. R. 7017.2025, subp. 3. The limit is final upon issuance of a permit amendment incorporating the change.	Minn. R. 7017.2025, subp. 3
MONITORING REQUIREMENTS	hdr
Monitoring Equipment Calibration: The Permittee shall calibrate all required monitoring equipment at least once every 12 months; replacement of monitoring equipment (gauges) satisfies this requirement. Any requirements applying to continuous emission monitors are listed separately in this permit.	Minn. R. 7007.0800, subp. 4(D)
Operation of Monitoring Equipment: Unless otherwise noted in Tables A, B, and/or C, monitoring a process or control equipment connected to that process is not necessary during periods when the process is shutdown, or during checks of the monitoring systems, such as calibration checks and zero and span adjustments. If monitoring records are required, they should reflect any such periods of process shutdown or checks of the monitoring system.	Minn. R. 7007.0800, subp. 4(D)
RECORDKEEPING	hdr
Recordkeeping: Retain all records at the stationary source, unless otherwise specified within this permit, for a period of five (5) years from the date of monitoring, sample, measurement, or report. Records which must be retained at this location include all calibration and maintenance records, all original recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Records must conform to the requirements listed in Minn. R. 7007.0800, subp. 5(A).	Minn. R. 7007.0800, subp. 5(C)
Recordkeeping: Maintain records describing any insignificant modifications (as required by Minn. R. 7007.1250, subp. 3) or changes contravening permit terms (as required by Minn. R. 7007.1350, subp. 2), including records of the emissions resulting from those changes.	Minn. R. 7007.0800, subp. 5(B)
If the Permittee determines that no permit amendment or notification is required prior to making a change, the Permittee must retain records of all calculations required under Minn. R. 7007.1200. These records shall be kept for a period of five years from the date the change was made or until permit reissuance, whichever is longer. The records shall be kept at the stationary source for the current calendar year of operation and may be kept at the stationary source or office of the stationary source for all other years. The records may be maintained in either electronic or paper format.	Minn. R. 7007.1200, subp. 4
REPORTING/SUBMITTALS	hdr

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-3**

08/17/11

Facility Name: Lamb Weston/RDO Frozen

Permit Number: 05700006 - 003

<p>Shutdown Notifications: Notify the Commissioner at least 24 hours in advance of a planned shutdown of any control equipment or process equipment if the shutdown would cause any increase in the emissions of any regulated air pollutant. If the owner or operator does not have advance knowledge of the shutdown, notification shall be made to the Commissioner as soon as possible after the shutdown. However, notification is not required in the circumstances outlined in Items A, B and C of Minn. R. 7019.1000, subp. 3.</p> <p>At the time of notification, the owner or operator shall inform the Commissioner of the cause of the shutdown and the estimated duration. The owner or operator shall notify the Commissioner when the shutdown is over.</p>	Minn. R. 7019.1000, subp. 3
<p>Breakdown Notifications: Notify the Commissioner within 24 hours of a breakdown of more than one hour duration of any control equipment or process equipment if the breakdown causes any increase in the emissions of any regulated air pollutant. The 24-hour time period starts when the breakdown was discovered or reasonably should have been discovered by the owner or operator. However, notification is not required in the circumstances outlined in Items A, B and C of Minn. R. 7019.1000, subp. 2.</p> <p>At the time of notification or as soon as possible thereafter, the owner or operator shall inform the Commissioner of the cause of the breakdown and the estimated duration. The owner or operator shall notify the Commissioner when the breakdown is over.</p>	Minn. R. 7019.1000, subp. 2
<p>Notification of Deviations Endangering Human Health or the Environment: As soon as possible after discovery, notify the Commissioner or the state duty officer, either orally or by facsimile, of any deviation from permit conditions which could endanger human health or the environment.</p>	Minn. R. 7019.1000, subp. 1
<p>Notification of Deviations Endangering Human Health or the Environment Report: Within 2 working days of discovery, notify the Commissioner in writing of any deviation from permit conditions which could endanger human health or the environment. Include the following information in this written description:</p> <ol style="list-style-type: none"> 1. the cause of the deviation; 2. the exact dates of the period of the deviation, if the deviation has been corrected; 3. whether or not the deviation has been corrected; 4. the anticipated time by which the deviation is expected to be corrected, if not yet corrected; and 5. steps taken or planned to reduce, eliminate, and prevent reoccurrence of the deviation. 	Minn. R. 7019.1000, subp. 1
<p>Application for Permit Amendment: If a permit amendment is needed, submit an application in accordance with the requirements of Minn. R. 7007.1150 through Minn. R. 7007.1500. Submittal dates vary, depending on the type of amendment needed.</p>	Minn. R. 7007.1150 - 7007.1500
<p>Extension Requests: The Permittee may apply for an Administrative Amendment to extend a deadline in a permit by no more than 120 days, provided the proposed deadline extension meets the requirements of Minn. R. 7007.1400, subp. 1(H). Performance testing deadlines from the General Provisions of 40 CFR pt. 60 and pt. 63 are examples of deadlines for which the MPCA does not have authority to grant extensions and therefore do not meet the requirements of Minn. R. 7007.1400, subp. 1(H).</p>	Minn. R. 7007.1400, subp. 1(H)
<p>Emission Inventory Report: due on or before April 1 of each calendar year following permit issuance, to be submitted on a form approved by the Commissioner.</p>	Minn. R. 7019.3000 - 7019.3100
<p>Emission Fees: due 60 days after receipt of an MPCA bill.</p>	Minn. R. 7002.0005 - 7002.0095

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-4**

08/17/11

Facility Name: Lamb Weston/RDO Frozen

Permit Number: 05700006 - 003

Subject Item: GP 001 Boiler SO2 Limit**Associated Items:** EU 001 Nebraska Boiler

EU 002 Boiler DS-40

EU 003 Boiler D-34

EU 017 Flare

SV 001 Boiler Stack

What to do	Why to do it
Sulfur Dioxide: less than or equal to 240 tons/year using 12-month Rolling Sum	Title I condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000
Daily Recordkeeping: On each day of operation, the Permittee shall record the quantity of distillate oil, biogas, and natural gas combusted in the GP001 units.	Title I condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000
Monthly Calculations: By the 15th day of each month, the Permittee shall calculate and record the sulfur dioxide emissions for the previous calendar month, using the equations in Appendix D of this permit.	Title I condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000
Monthly Recordkeeping: By the 15th day of each month, calculate and record the 12-month rolling sum of sulfur dioxide emissions by summing the sulfur dioxide emissions calculated during each of the previous 12 months.	Title I condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-5**

08/17/11

Facility Name: Lamb Weston/RDO Frozen

Permit Number: 05700006 - 003

Subject Item: GP 002 Fryers

Associated Items: CE 002 Spray Tower
 CE 003 Spray Tower
 CE 004 Spray Tower
 EU 005 Potato Frying (Line 2)
 EU 006 Chopped & Formed Fryers (Line 3)
 EU 009 Line 1 Fryer
 EU 010 Chopped& Formed Line 4

What to do	Why to do it
EMISSION AND OPERATING LIMITS	hdr
Total Particulate Matter: less than or equal to 0.30 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735. This limit applies individually to each emission unit (EUxxx) listed as an Associated Item.	Minn. R. 7011.0715, subp. 1(A)
Opacity: less than or equal to 20 percent opacity . This limit applies individually to each emission unit (EUxxx) listed as an Associated Item.	Minn. R. 7011.0715, subp. 1(B)
Process Throughput: less than or equal to 486180 tons/year using 12-month Rolling Sum calculated monthly as described below.	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000
RECORDKEEPING REQUIREMENTS	hdr
Daily Recordkeeping: Each operating day, record the total quantity of potatoes processed through the emission units included in GP002.	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000
Monthly Recordkeeping: By the 15th day of each month, calculate and record the following: -- Total quantity of potatoes processed through the emission units in GP002 during the previous month, and -- Total quantity of potatoes processed through the emission units in GP002 during the previous 12 months (12 month rolling sum).	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000
CONTROL REQUIREMENTS (See also Subject Items CE002, CE003, and CE004)	hdr
The Permittee shall operate and maintain each control device at all times that the emission unit(s) controlled by the device is/are in operation. The Permittee shall document periods of non-operation of the control equipment. CE004 controls emissions from EU005 CE002 controls emissions from EU006 and EU010 CE003 controls emissions from EU009	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-6**

08/17/11

Facility Name: Lamb Weston/RDO Frozen

Permit Number: 05700006 - 003

Subject Item: GP 003 GHG Restrictions**Associated Items:** EU 001 Nebraska Boiler

EU 002 Boiler DS-40

EU 003 Boiler D-34

EU 011 AMU 6

EU 012 AMU 10

EU 013 AMU 11

EU 014 AMU 14

EU 015 AMU 15

EU 016 AMU 16

EU 017 Flare

What to do	Why to do it
Carbon Dioxide Equivalent: less than or equal to 95000 tons/year using 12-month Rolling Sum	Title I condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000
Daily Recordkeeping: On each day of operation, the Permittee shall record the quantity of distillate oil, biogas, and natural gas combusted in the GP003 units.	Title I condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000
Monthly Calculations: By the 15th day of each month, the Permittee shall calculate and record the carbon dioxide equivalent emissions for the previous calendar month, using the equations in Appendix C of this permit.	Title I condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000
Monthly Recordkeeping: By the 15th day of each month, calculate and record the 12-month rolling sum of carbon dioxide equivalent emissions by summing the carbon dioxide equivalent emissions calculated during each of the previous 12 months.	Title I condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-7** 08/17/11

Facility Name: Lamb Weston/RDO Frozen

Permit Number: 05700006 - 003

Subject Item: GP 004 Boiler NESHAP Requirements**Associated Items:** EU 001 Nebraska Boiler

EU 002 Boiler DS-40

EU 003 Boiler D-34

What to do	Why to do it
The following requirements of 40 CFR Part 63, Subpart JJJJJJ, apply to each of the existing boilers (EU001, EU002, EU003).	Hdr
At all times you must operate and maintain the boilers in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.	40 CFR Section 63.11205(a)
Have a one-time energy assessment performed by a qualified energy assessor, no later than 3/21/14. An energy assessment completed on or after 1/1/08, that meets or is amended to meet the energy assessment requirements below satisfies the energy assessment requirement. The energy assessment must include: (1) A visual inspection of the boiler system, (2) An evaluation of operating characteristics of the facility, specifications of energy using systems, O&M procedures, and unusual operating constraints, (3) Inventory of major systems consuming energy from the boiler(s), (4) A review of available architectural and engineering plans, facility O&M procedures and logs, and fuel usage, (5) A list of major energy conservation measures, (6) A list of energy savings potential of the energy conservation measures identified, (7) A comprehensive report detailing ways to improve efficiency, cost of specific improvements, benefits, and the time frame for recouping those investments.	40 CFR Section 63.11201(b); 40 CFR Section 63.11196(a)(3); 40 CFR Section 63.11210(c)
Conduct a tune-up of each boiler biennially, no more than 25 months after the previous tune-up. The first biennial tune-up must take place no later than March 21, 2012.	40 CFR Section 63.11201(b); 40 CFR Section 63.11223(a); 40 CFR Section 63.11196(a)(1); 40 CFR Section 63.11210(c)
Biennial tune-up includes the following: (1) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown, but you must inspect each burner at least once every 36 months). (2) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available. (3) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly. (4) Optimize total emissions of carbon monoxide. This optimization should be consistent with the manufacturer's specifications, if available. (continued below)	40 CFR Section 63.11223(b)

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-8**

08/17/11

Facility Name: Lamb Weston/RDO Frozen

Permit Number: 05700006 - 003

<p>(continued from above)</p> <p>(5) Measure the concentrations in the effluent stream of carbon monoxide in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (may use either a dry or wet basis, as long as it is the same basis before and after the adjustments are made).</p> <p>(6) Maintain onsite and submit, if requested by the Administrator, a biennial report containing the following:</p> <ul style="list-style-type: none"> (i) the concentration of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured before and after the tune-up of the boiler. (ii) a description of any corrective actions taken as part of the tune-up of the boiler (iii) the type and amount of fuel used over the 12 months prior to the biennial tune-up of the boiler. <p>(7) If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within one week of startup.</p>	40 CFR Section 63.11223(b)
<p>By March 1 of each year, prepare, and submit upon request, an annual compliance certification report for the previous calendar year containing the information in items (1) - (3) below. You must submit the report by March 15 if you had any instances described by item (3). For boilers that are subject only to the requirement to conduct a biennial tune-up and not subject to emission limits or operating limits, you may prepare only a biennial compliance report instead of a semi-annual report.</p> <p>(1) Company name and address.</p> <p>(2) Statement by a responsible official, with the official's name, title, phone number, e-mail address, and signature, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of Subpart JJJJJ.</p> <p>(continued below)</p>	40 CFR Section 63.11225(b)
<p>(continued from above)</p> <p>(3) If the source experiences any deviations from the applicable requirements during the reporting period, include a description of deviations, the time periods during which the deviations occurred, and the corrective actions taken.</p>	40 CFR Section 63.11225(b)
<p>Maintain the records specified below:</p> <p>(1) As required in 40 CFR Section 63.10(b)(2)(xiv), you must keep a copy of each notification and report that you submitted to comply with this subpart and all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted.</p> <p>(2)(i) You must keep records to identify each boiler, the date of tune-up, and the manufacturer's specifications to which the boiler was tuned.</p> <p>(3) (not applicable)</p> <p>(4) Records of the occurrence and duration of each malfunction of the boiler.</p> <p>(5) Records of actions taken during malfunction to minimize the emissions in accordance with the general duty to minimize emissions, including corrective actions to restore the malfunctioning boiler to its normal or usual manner of operation.</p>	40 CFR Section 63.11225(c)
<p>Records must be in a form suitable and readily available for expeditious review, according to 40 CFR Section 63.10(b)(1). You must keep each record for 5 years following the date of each recorded action.</p>	40 CFR Section 63.11225(d)

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-9**

08/17/11

Facility Name: Lamb Weston/RDO Frozen

Permit Number: 05700006 - 003

Subject Item: GP 005 Air Make-Up Units**Associated Items:** EU 011 AMU 6

EU 012 AMU 10

EU 013 AMU 11

EU 014 AMU 14

EU 015 AMU 15

EU 016 AMU 16

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.40 lbs/million Btu heat input . This limit applies individually to each emission unit listed as an Associated Item. The potential to emit from each unit is 0.0074 lb/MMBtu due to equipment design and allowable fuels.	Minn. R. 7011.0515, subp. 1
Opacity: less than or equal to 20 percent opacity except for one six-minute period per hour of not more than 60 percent opacity. This limit applies individually to each emission unit listed as an Associated Item.	Minn. R. 7011.0515, subp. 2
Allowed Fuels: Fuel used is limited to natural gas, by design.	Minn. R. 7005.0100, subp. 35a

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-10** 08/17/11

Facility Name: Lamb Weston/RDO Frozen

Permit Number: 05700006 - 003

Subject Item: EU 001 Nebraska Boiler**Associated Items:** GP 001 Boiler SO2 Limit

GP 003 GHG Restrictions

GP 004 Boiler NESHAP Requirements

MR 001 Nebraska Boiler Opacity Monitor

MR 003 Nebraska Boiler O2 Monitor

MR 004 Nebraska Boiler NOX Monitor

SV 001 Boiler Stack

What to do	Why to do it
EMISSION LIMITS (Note that this emission unit is subject to additional group limits shown at Subject Items GP 001 and GP 003)	hdr
Sulfur Dioxide: less than or equal to 0.2 lbs/million Btu heat input using 30-day Rolling Average when combusting oil. This limit applies at all times including start up, shutdown and malfunction.	40 CFR Sections 60.42b(a), 60.42b(e), 40 CFR 60.42b(g), and 40 CFR 60.42b(j); 40 CFR Section 60.45b(a); Minn. R. 7011.0565
Opacity: less than or equal to 20 percent opacity using 6-minute Average except for one 6-minute period per hour of not more than 27 percent opacity. The opacity standard applies at all times except during periods of startup, shutdown or malfunction.	40 CFR Section 60.43b(f); 40 CFR Section 60.43b(g); 40 CFR Section 60.46b(a); Minn. R. 7011.0565
Nitrogen Oxides: less than or equal to 0.2 lbs/million Btu heat input using 30-day Rolling Average when burning fuel oil or natural gas alone. This limit applies at all times including start up, shutdown and malfunction.	40 CFR Section 60.44b(a)(1); 40 CFR Section 60.44b(b); 40 CFR Section 60.44b(c); 40 CFR Section 60.44b(h); 40 CFR Section 60.44b(i); 40 CFR Section 60.46b(a); Minn. R. 7011.0565
Sulfur Content of Fuel: less than or equal to 0.5 percent by weight for distillate oil	40 CFR Section 60.41b (definition of very low sulfur oil); Minn. R. 7011.0565
Allowed Fuels: Fuels used are limited to distillate fuel oil, biogas, and natural gas.	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000
MONITORING	hdr
Calibrate, maintain, and operate a continuous opacity monitoring system (COMS) for measuring the opacity of emissions discharged into the atmosphere and record the output of the system.	40 CFR Section 60.48b(a); Minn. R. 7011.0565
Calibrate, maintain, and operate CEMS for measuring NOX and O2 emissions discharged to the atmosphere, and record the output of the system.	40 CFR Section 60.48b(b)(1); Minn. R. 7011.0565
The 1-hour average NOx emission rates shall be expressed in lb/MMBTU heat input and shall be used to calculate the average emission rate. The 1-hour averages shall be calculated using the data points required under 40 CFR 60.13. At least 2 data points must be used to calculate each 1-hour average.	40 CFR Section 60.48b(d); Minn. R. 7011.0565
When NOX emission data are not obtained because of CEMS breakdowns, repairs, calibration checks and zero and span adjustments, emission data will be obtained by using standby monitoring systems, Method 7 or 7A of Appendix A of Part 60, or other approved reference methods to provide emission data for a minimum of 75 percent of the operating hours in each steam generating unit operating day, in at least 22 out of 30 successive steam generating unit operating days.	40 CFR Section 60.48b(f); Minn. R. 7011.0565
Each day, if oil was combusted at any time during the previous 30 calendar days, calculate and record the 30-day average SO2 emission in lb/MMBtu, using the quantity of fuel oil combusted, the heat content of the fuel oil, and the actual sulfur content of the fuel oil.	Minn. R. 7007.0800, subp. 4.B.
RECORDKEEPING	hdr
Demonstrate that the oil used meets the definition of very low sulfur oil by maintaining fuel records as described in 40 CFR Section 60.49b(r).	40 CFR Section 60.42b(j)(2); Minn. R. 7011.0565
Record and maintain records of the amounts of each fuel combusted during each day and calculate the annual capacity factor individually for distillate oil and natural gas for the reporting period. The annual capacity factor is determined on a 12-month rolling average basis with a new annual capacity factor calculated at the end of each calendar month.	40 CFR Section 60.49b(d)(1); Minn. R. 7011.0565
For each COMS, maintain records of the opacity.	40 CFR Section 60.49b(f); Minn. R. 7011.0565

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-11** 08/17/11

Facility Name: Lamb Weston/RDO Frozen

Permit Number: 05700006 - 003

<p>Maintain records of the following information for each steam generating unit operating day:</p> <p>(1) Calendar date;</p> <p>(2) The average hourly NOX emission rates (expressed as NO2) in lb/MMBtu measured or predicted;</p> <p>(3) The 30-day average NOX emission rates (in lb/MMBtu heat input) calculated at the end of each steam generating unit operating day from the measured or predicted hourly nitrogen oxide emission rates for the preceding 30 steam generating unit operating days;</p> <p>(4) Identification of the steam generating unit operating days when the calculated 30-day average NOX emission rates are in excess of the NOX emission standards under 40 CFR Section 60.44b, with the reasons for such excess emissions as well as a description of corrective actions taken;</p> <p>(continued below)</p>	40 CFR Section 60.49b(g); Minn. R. 7011.0565
<p>(continued from above)</p> <p>(5) Identification of the steam generating unit operating days for which pollutant data have not been obtained, including reasons for not obtaining sufficient data and a description of corrective actions taken;</p> <p>(6) Identification of the times when emission data have been excluded from the calculation of average emission rates and the reasons for excluding data;</p> <p>(7) Identification of the "F" factor used for calculations, method of determination, and type of fuel combusted;</p> <p>(8) Identification of the times when the pollutant concentration exceeded the full span of the CEMS;</p> <p>(9) Description of any modification to the CEMS that could affect the ability of the CEMS to comply with Performance Specification 2 or 3; and</p> <p>(10) Results of daily CEMS drift tests and quarterly accuracy assessments as required under Appendix F, Procedure 1 of Part 60.</p>	40 CFR Section 60.49b(g); Minn. R. 7011.0565
<p>All records required under this section shall be maintained by the Permittee for a period of 2 years following the date of such record.</p> <p>(NOTE: Part 70 requires that all records be kept for a minimum of 5 years, as described under the Total Facility section of Table A of this permit.)</p>	40 CFR Section 60.49b(o); Minn. R. 7011.0565
<p>Obtain and maintain at the facility fuel receipts from the fuel supplier that certify that the oil meets the definition of distillate oil as defined in 40 CFR Section 60.41b, and the sulfur limit. For the purposes of this requirement, the distillate oil need not meet the fuel nitrogen content specification in the definition of distillate oil. Reports shall be submitted to the Administrator certifying that only very low sulfur oil meeting this definition, natural gas, and other fuels known to contain insignificant amounts of sulfur were combusted in EU001 during the reporting period.</p> <p>OR</p> <p>Comply with the requirements of 40 CFR Section 60.49b(r)(2).</p>	40 CFR Section 60.49b(r)(1); Minn. R. 7011.0565
<p>Develop and submit a site-specific fuel analysis plan to the Administrator for review and approval no later than 60 days before the date you intend to demonstrate compliance using this method. Each fuel analysis plan shall include a minimum initial requirement of weekly testing and each analysis report shall contain, at a minimum, the following information:</p> <p>(i) The potential sulfur emissions rate of the representative fuel mixture in ng/J heat input;</p> <p>(ii) The method used to determine the potential sulfur emissions rate of each constituent of the mixture. For natural gas and distillate oil a fuel receipt or tariff sheet is acceptable;</p> <p>(iii) The ratio of different fuels in the mixture; and</p> <p>(iv) You may petition the Administrator to approve monthly or quarterly sampling in place of weekly sampling.</p> <p>OR</p> <p>Comply with the requirements of 40 CFR Section 60.49b(r)(1).</p>	40 CFR Section 60.49b(r)(2); Minn. R. 7011.0565
REPORTING	hdr
<p>Submit: due 30 days after end of each calendar half-year starting 12/01/1994. Submit reports of information listed in 60.49b(g). The reporting period is each 6 month period. All reports shall be submitted to the Administrator and shall be postmarked by the 30th day following the end of the reporting period.</p>	40 CFR Section 60.49b(i) & (w); Minn. R. 7011.0565

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-12**

08/17/11

Facility Name: Lamb Weston/RDO Frozen

Permit Number: 05700006 - 003

The Permittee may submit electronic quarterly reports for SO₂ and/or NO_x and/or opacity in lieu of submitting the written report required under 40 CFR Section 60.49b(h) or (i). The format of each quarterly electronic written report shall be coordinated with the MPCA. The electronic report(s) shall be submitted no later than 30 days after the end of the calendar quarter and shall be accompanied by a certification statement from the Permittee, indicating whether compliance with the applicable emission standards and minimum data requirements of Subpart Db was achieved during the reporting period. Before submitting reports in the electronic format, the Permittee shall coordinate with the MPCA to obtain their agreement to submit reports in this alternative format.

40 CFR Section 60.49b(v); Minn. R. 7011.0565

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-13**

08/17/11

Facility Name: Lamb Weston/RDO Frozen

Permit Number: 05700006 - 003

Subject Item: EU 002 Boiler DS-40**Associated Items:** GP 001 Boiler SO2 Limit

GP 003 GHG Restrictions

GP 004 Boiler NESHAP Requirements

SV 001 Boiler Stack

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.40 lbs/million Btu heat input . The potential to emit from the unit is 0.024 lb/MMBtu due to equipment design and allowable fuels.	Minn. R. 7011.0515, subp. 1
Opacity: less than or equal to 20 percent opacity except for one six-minute period per hour of not more than 60 percent opacity.	Minn. R. 7011.0515, subp. 2
Allowed Fuels: Fuels used are limited to distillate fuel oil, biogas, and natural gas, by design.	Minn. R. 7005.0100, subp. 35a
Sulfur Content of Fuel: less than or equal to 0.5 percent by weight for distillate oil.	Minn. R. 7005.0100, subp. 35a
The sulfur content of the fuel oil used is tracked under the requirements of EU001.	

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-14**

08/17/11

Facility Name: Lamb Weston/RDO Frozen

Permit Number: 05700006 - 003

Subject Item: EU 003 Boiler D-34**Associated Items:** GP 001 Boiler SO2 Limit

GP 003 GHG Restrictions

GP 004 Boiler NESHAP Requirements

SV 001 Boiler Stack

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.40 lbs/million Btu heat input . The potential to emit from the unit is 0.024 lb/MMBtu due to equipment design and allowable fuels.	Minn. R. 7011.0515, subp. 1
Opacity: less than or equal to 20 percent opacity except for one six-minute period per hour of not more than 60 percent opacity.	Minn. R. 7011.0515, subp. 2
Allowed Fuels: Fuels used are limited to distillate fuel oil, biogas, and natural gas, by design.	Minn. R. 7005.0100, subp. 35a
Sulfur Content of Fuel: less than or equal to 0.5 percent by weight for distillate oil.	Minn. R. 7005.0100, subp. 35a
The sulfur content of the fuel oil used is tracked under the requirements of EU001.	

TABLE A: LIMITS AND OTHER REQUIREMENTS

A-15 08/17/11

Facility Name: Lamb Weston/RDO Frozen

Permit Number: 05700006 - 003

Subject Item: CE 002 Spray Tower**Associated Items:** EU 006 Chopped & Formed Fryers (Line 3)

EU 010 Chopped& Formed Line 4

GP 002 Fryers

What to do	Why to do it
The Permittee shall operate and maintain the scrubber (CE002) at any time that the process equipment controlled by the scrubber (EU006 and EU010) is in operation. The Permittee shall document periods of non-operation of the control equipment.	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000
The Permittee shall operate and maintain the scrubber in accordance with the Operation and Maintenance (O & M) Plan. The Permittee shall keep copies of the O & M Plan available for use by staff and MPCA staff.	Minn. R. 7007.0800, subp. 14
Water pressure: greater than or equal to 16 psi (gauge) and less than or equal to 24 psi (gauge) , unless a new range is set pursuant to Minn. R. 7017.2025, subp. 3, based on the values recorded during the most recent MPCA-approved performance test where compliance was demonstrated. The new range shall be implemented upon receipt of the Notice of Compliance letter granting preliminary approval. The range is final upon issuance of a permit amendment incorporating the change.	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000
The Permittee shall operate and maintain the control equipment such that it achieves an overall control efficiency for Total Particulate Matter: greater than or equal to 51 percent control efficiency	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000
The Permittee shall operate and maintain the control equipment such that it achieves an overall capture and control efficiency for PM < 10 micron: greater than or equal to 51 percent	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000
The Permittee shall operate and maintain the control equipment such that it achieves an overall capture and control efficiency for PM < 2.5 micron: greater than or equal to 51 percent control efficiency	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000
MONITORING AND RECORDKEEPING	hdr
Daily Inspections: The Permittee shall do the following, once every 24 hours: Read and record the water supply pressure.	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000; Minn. R. 7007.0800, subps. 4 and 5
Recordkeeping of Water Supply Pressure: The Permittee shall record the time and date of each water supply pressure reading, and whether or not the observed value was within the range specified in this permit. Recorded values outside the range specified in this permit are considered Deviations as defined by Minn. R. 7007.0100, subp. 8a.	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000; Minn. R. 7007.0800, subps. 4 and 5
Periodic Inspections: At least once per calendar quarter, or more frequently as required by the manufacturing specifications, the Permittee shall inspect the control equipment components. The Permittee shall maintain a written record of these inspections.	Minn. R. 7007.0800, subps. 4, 5 and 14
Corrective Actions: The Permittee shall take corrective action as soon as possible if any of the following occur: - the recorded water pressure is outside the required operating range; or - the wet scrubber or any of its components are found during the inspections to need repair. Corrective actions shall return the water pressure to within the permitted range and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan. The Permittee shall keep a record of the type and date of any corrective action taken.	Minn. R. 7007.0800, subps. 4, 5, and 14
Monitoring Equipment: The Permittee shall install and maintain the necessary monitoring equipment for measuring and recording water supply pressure as required by this permit. The monitoring equipment must be installed, in use, and properly maintained when the monitored scrubber is in operation.	Minn. R. 7007.0800, subp. 4

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-16** 08/17/11

Facility Name: Lamb Weston/RDO Frozen

Permit Number: 05700006 - 003

Subject Item: CE 003 Spray Tower**Associated Items:** EU 009 Line 1 Fryer

GP 002 Fryers

What to do	Why to do it
The Permittee shall operate and maintain the scrubber (CE003) at any time that the process equipment controlled by the scrubber (EU009) is in operation. The Permittee shall document periods of non-operation of the control equipment.	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000
The Permittee shall operate and maintain the scrubber in accordance with the Operation and Maintenance (O & M) Plan. The Permittee shall keep copies of the O & M Plan available for use by staff and MPCA staff.	Minn. R. 7007.0800, subp. 14
Water pressure: greater than or equal to 18 psi (gauge) and less than or equal to 35 psi (gauge) , unless a new range is set pursuant to Minn. R. 7017.2025, subp. 3, based on the values recorded during the most recent MPCA-approved performance test where compliance was demonstrated. The new range shall be implemented upon receipt of the Notice of Compliance letter granting preliminary approval. The range is final upon issuance of a permit amendment incorporating the change.	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000
The Permittee shall operate and maintain the control equipment such that it achieves an overall control efficiency for Total Particulate Matter: greater than or equal to 68 percent control efficiency	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000
The Permittee shall operate and maintain the control equipment such that it achieves an overall capture and control efficiency for PM < 10 micron: greater than or equal to 68 percent	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000
The Permittee shall operate and maintain the control equipment such that it achieves an overall capture and control efficiency for PM < 2.5 micron: greater than or equal to 68 percent control efficiency	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000
MONITORING AND RECORDKEEPING	hdr
Daily Inspections: The Permittee shall do the following, once every 24 hours: Read and record the water supply pressure.	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000; 40 CFR Section 64.3; Minn. R. 7017.0200
Recordkeeping of Water Supply Pressure: The Permittee shall record the time and date of each water supply pressure reading, and whether or not the observed value was within the range specified in this permit. Recorded values outside the range specified in this permit are considered Deviations as defined by Minn. R. 7007.0100, subp. 8a.	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000; 40 CFR Section 64.3; Minn. R. 7017.0200
Periodic Inspections: At least once per calendar quarter, or more frequently as required by the manufacturing specifications, the Permittee shall inspect the control equipment components. The Permittee shall maintain a written record of these inspections.	40 CFR Section 64.3; Minn. R. 7017.0200
Corrective Actions: The Permittee shall take corrective action as soon as possible if any of the following occur: - the recorded water pressure is outside the required operating range; or - the wet scrubber or any of its components are found during the inspections to need repair. Corrective actions shall return the water pressure to within the permitted range and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan. The Permittee shall keep a record of the type and date of any corrective action taken.	40 CFR Section 64.7(d); Minn. R. 7017.0200
Monitoring Equipment: The Permittee shall install and maintain the necessary monitoring equipment for measuring and recording water supply pressure as required by this permit. The monitoring equipment must be installed, in use, and properly maintained when the monitored scrubber is in operation.	40 CFR Section 64.7(b); Minn. R. 7017.0200
The Permittee shall calibrate the gauges at least once every 12 months and shall maintain a written record of any action resulting from the calibration.	40 CFR Section 64.3; Minn. R. 7017.0200
Documentation of Need for Improved Monitoring: If the Permittee fails to achieve compliance with an emission limitation or standard for which the monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing pressure drop range, the Permittee shall promptly notify the MPCA and, if necessary, submit a permit amendment application to address the necessary monitoring change.	40 CFR Section 64.7(e); Minn. R. 7017.0200

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-17**

08/17/11

Facility Name: Lamb Weston/RDO Frozen

Permit Number: 05700006 - 003

As required by 40 CFR Section 64.9(a)(2), for the Semi-Annual Deviations Report listed in Table B of this permit and/or the Notification of Deviations Endangering Human Health and the Environment listed earlier in Table A of this permit, as applicable, the Permittee shall include the following related to the monitoring identified as required by 40 CFR pt. 64: 1) Summary information on the number, duration, and cause of excursions or exceedances, as applicable, and the corrective action taken; and 2) Summary information on the number, duration, and cause for monitor downtime incidents.	40 CFR Section 64.9(a)(2); Minn. R. 7017.0200
The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, and other supporting information required to be maintained. The Permittee may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.	40 CFR Section 64.9(b); Minn. R. 7017.0200
Annual Hood Evaluation: The Permittee shall measure and record at least once every 12 months the fan rotation speed, fan power draw, or face velocity of each hood, or other comparable air flow indication method. The Permittee shall maintain a copy of the annual evaluation on site.	Minn. R. 7007.0800, subp. 4, 5, and 14

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-18** 08/17/11

Facility Name: Lamb Weston/RDO Frozen

Permit Number: 05700006 - 003

Subject Item: CE 004 Spray Tower**Associated Items:** EU 005 Potato Frying (Line 2)

GP 002 Fryers

What to do	Why to do it
The Permittee shall operate and maintain the scrubber (CE004) at any time that the process equipment controlled by the scrubber (EU005) is in operation. The Permittee shall document periods of non-operation of the control equipment.	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000
The Permittee shall operate and maintain the scrubber in accordance with the Operation and Maintenance (O & M) Plan. The Permittee shall keep copies of the O & M Plan available for use by staff and MPCA staff.	Minn. R. 7007.0800, subp. 14
Water pressure: greater than or equal to 18 psi (gauge) and less than or equal to 22 psi (gauge) , unless a new range is set pursuant to Minn. R. 7017.2025, subp. 3, based on the values recorded during the most recent MPCA-approved performance test where compliance was demonstrated. The new range shall be implemented upon receipt of the Notice of Compliance letter granting preliminary approval. The range is final upon issuance of a permit amendment incorporating the change.	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000
The Permittee shall operate and maintain the control equipment such that it achieves an overall control efficiency for Total Particulate Matter: greater than or equal to 68 percent control efficiency	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000
The Permittee shall operate and maintain the control equipment such that it achieves an overall capture and control efficiency for PM < 10 micron: greater than or equal to 68 percent	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000
The Permittee shall operate and maintain the control equipment such that it achieves an overall capture and control efficiency for PM < 2.5 micron: greater than or equal to 68 percent control efficiency	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000
MONITORING AND RECORDKEEPING	hdr
Daily Inspections: The Permittee shall do the following, once every 24 hours: Read and record the water supply pressure.	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000; 40 CFR Section 64.3; Minn. R. 7017.0200
Recordkeeping of Water Supply Pressure: The Permittee shall record the time and date of each water supply pressure reading, and whether or not the observed value was within the range specified in this permit. Recorded values outside the range specified in this permit are considered Deviations as defined by Minn. R. 7007.0100, subp. 8a.	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000; 40 CFR Section 64.3; Minn. R. 7017.0200
Periodic Inspections: At least once per calendar quarter, or more frequently as required by the manufacturing specifications, the Permittee shall inspect the control equipment components. The Permittee shall maintain a written record of these inspections.	40 CFR Section 64.3; Minn. R. 7017.0200
Corrective Actions: The Permittee shall take corrective action as soon as possible if any of the following occur: - the recorded water pressure is outside the required operating range; or - the wet scrubber or any of its components are found during the inspections to need repair. Corrective actions shall return the water pressure to within the permitted range and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan. The Permittee shall keep a record of the type and date of any corrective action taken.	40 CFR Section 64.7(d); Minn. R. 7017.0200
Monitoring Equipment: The Permittee shall install and maintain the necessary monitoring equipment for measuring and recording water supply pressure as required by this permit. The monitoring equipment must be installed, in use, and properly maintained when the monitored scrubber is in operation.	40 CFR Section 64.7(b); Minn. R. 7017.0200
The Permittee shall calibrate the gauges at least once every 12 months and shall maintain a written record of any action resulting from the calibration.	40 CFR Section 64.3; Minn. R. 7017.0200
Documentation of Need for Improved Monitoring: If the Permittee fails to achieve compliance with an emission limitation or standard for which the monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing pressure drop range, the Permittee shall promptly notify the MPCA and, if necessary, submit a permit amendment application to address the necessary monitoring change.	40 CFR Section 64.7(e); Minn. R. 7017.0200

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-19**

08/17/11

Facility Name: Lamb Weston/RDO Frozen

Permit Number: 05700006 - 003

As required by 40 CFR Section 64.9(a)(2), for the Semi-Annual Deviations Report listed in Table B of this permit and/or the Notification of Deviations Endangering Human Health and the Environment listed earlier in Table A of this permit, as applicable, the Permittee shall include the following related to the monitoring identified as required by 40 CFR pt. 64: 1) Summary information on the number, duration, and cause of excursions or exceedances, as applicable, and the corrective action taken; and 2) Summary information on the number, duration, and cause for monitor downtime incidents.	40 CFR Section 64.9(a)(2); Minn. R. 7017.0200
The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, and other supporting information required to be maintained. The Permittee may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.	40 CFR Section 64.9(b); Minn. R. 7017.0200
Annual Hood Evaluation: The Permittee shall measure and record at least once every 12 months the fan rotation speed, fan power draw, or face velocity of each hood, or other comparable air flow indication method. The Permittee shall maintain a copy of the annual evaluation on site.	Minn. R. 7007.0800, subp. 4, 5, and 14

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-20**

08/17/11

Facility Name: Lamb Weston/RDO Frozen

Permit Number: 05700006 - 003

Subject Item: MR 001 Nebraska Boiler Opacity Monitor**Associated Items:** CM 001 Nebraska Boiler: 20% Opacity, EU001, 6-min ave.

EU 001 Nebraska Boiler

What to do	Why to do it
Continuous Operation: COMS must be operated and data recorded during all periods of emission unit operation including periods of emission unit start-up, shutdown, or malfunction except for periods of acceptable monitor downtime. This requirement applies whether or not a numerical emission limit applies during these periods. A COMS must not be bypassed except in emergencies where failure to bypass would endanger human health, safety, or plant equipment. Acceptable monitor downtime includes reasonable periods as listed in Items A, B, C and D of Minn. R. 7017.1090, subp. 2.	Minn. R. 7017.1090, subp. 1; 40 CFR Section 60.13(e)
Monitoring Data: All COMS data must be reduced to six-minute averages. A six minute average is valid only if it contains data from at least five minutes within the averaging period. COMS data shall be reduced and calculated as outlined in Minn. R. 7017.1200, subp. 3.	Minn. R. 7017.1200, subp. 1, 2 & 3; 40 CFR Section 60.13(e)(1); 40 CFR Section 60.13(h)
QA Plan: Develop and implement a written quality assurance plan which covers the COMS. The plan shall be on site and available for inspection. The plan shall contain the written procedures listed in Minn. R. 7017.1210, subp. 1. The plan shall include the manufacturer's spare parts list for the COMS and require that those parts be kept at the facility unless the Commissioner gives written approval to exclude specific spare parts from the list.	Minn. R. 7017.1210, subp. 1
COMS QA/QC: The owner or operator of an affected facility is subject to the performance specifications listed in 40 CFR pt. 60, Appendix B and shall operate, calibrate, and maintain each COMS according to the QA/QC procedures in Minn. R. 7017.1210.	40 CFR Section 60.13(a); Minn. R. 7017.1210
COMS Daily Calibration Drift Test: The Calibration Drift shall be quantified and recorded at zero (low-level) and upscale (high-level) calibration drift at least once daily according to the procedures listed in 40 CFR Section 60.13(d)(2) and Part 60, Appendix B, PS-1. The zero and upscale calibration levels must be determined using the span value specified in the applicable requirement. If the applicable requirement does not specify a span value, a span value of 60, 70, or 80 percent opacity must be used unless an alternative span value is approved by the Commissioner. 40 CFR Part 60, Appendix F, shall be used to determine out-of-control periods for COMS.	Minn. R. 7017.1210, subp. 2; 40 CFR Section 60.13(d)(1) regarding COMS and 60.13(d)(2)
COMS Attenuator Calibration: The Permittee shall semiannually have an independent testing company conduct calibrations of each of the neutral density filters used in the calibration error audit according to the procedure in 40 CFR Part 60, Appendix B.	Minn. R. 7017.1210, subp. 4
COMS Calibration Error Audit: due before end of each calendar half-year following Permit Issuance. Audits are to be at least three months apart but no more than eight months apart except that a calibration error audit need not be conducted during any semiannual period in which the emission unit operated less than 24 hours. The calibration error audit shall be conducted according to the procedures in 40 CFR Part 60, Appendix B, Performance Specification No. 1.	Minn. R. 7017.1210, subp. 3
Recordkeeping: The owner or operator must retain records of all COMS monitoring data and support information for a period of five years from the date of the monitoring sample, measurement or report. Records shall be kept at the source.	Minn. R. 7017.1130

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-21**

08/17/11

Facility Name: Lamb Weston/RDO Frozen

Permit Number: 05700006 - 003

Subject Item: MR 003 Nebraska Boiler O2 Monitor**Associated Items:** CM 002 Nebraska Boiler: 0.10 lbs NOx/mmBtu, EU001, 30 DRA

EU 001 Nebraska Boiler

What to do	Why to do it
CEMS Monitor Design: Each CEMS shall be designed to complete a minimum of one cycle of sampling, analyzing, and data recording in each 15-minute period.	40 CFR Section 60.13(e)(2)
Continuous Operation: CEMS must be operated and data recorded during all periods of operation of EU001, including periods of emission unit start-up, shutdown, or malfunction, except for periods of acceptable monitor downtime. This requirement applies whether or not a numerical emission limit applies during these periods. A CEMS must not be bypassed except in emergencies where failure to bypass would endanger human health, safety, or plant equipment.	40 CFR Section 60.13(e), Minn. R. 7017.1090, subp. 1; 40 CFR Section 60.48b(b)(c); Minn. R. 7011.0565
QA Plan: Develop and implement a written quality assurance plan that covers each CEMS. The plan shall be on site and available for inspection within 30 days after monitor certification. The plan shall contain all of the information required by 40 CFR pt. 60, Appendix F, Section 3. The plan shall include the manufacturer's spare parts list for the CEMS and require that those parts be kept at the facility unless the Commissioner gives written approval to exclude specific spare parts from the list.	Minn. R. 7017.1170, subp. 2; 40 CFR pt. 60, App. F; section 3
CEMS QA/QC: The owner or operator of an affected facility is subject to the performance specifications listed in 40 CFR pt. 60, Appendix B and shall operate, calibrate, and maintain each CEMS according to the QA/QC procedures in 40 CFR pt. 60, Appendix F as amended and maintain a written QA/QC program available in a form suitable for inspection.	40 CFR pt. 60, Appendix F; 40 CFR Section 60.13(a)
CEMS Daily Calibration Drift Test: Check the zero (low level value between 0 and 20 percent of span value) and span (50 to 100 percent of span value) calibration drifts at least once daily. The zero and span must, at a minimum, be adjusted whenever the drift exceeds two times the limit specified in 40 CFR pt. 60, Appendix B. 40 CFR pt. 60, Appendix F shall be used to determine out-of-control periods for CEMS.	40 CFR pt. 60, Appendix F, section 4.1; 40 CFR Section 60.13(d)(1) regarding CEMS; Minn. R. 7017.1170, subp. 3
Cylinder Gas Audit (CGA): due before end of each three out of four calendar quarters following Permit Issuances but no more than three quarters in succession. A CGA is not required during any calendar quarter in which a RATA was performed.	40 CFR pt. 60, Appendix F, section 5.1.2; Minn. R. 7017.1170, subp. 4
CEMS Relative Accuracy Test Audit (RATA): due before end of every one out of four calendar quarters following Permit Issuance.	40 CFR pt. 60, Appendix F, section 5.1.1; Minn. R. 7017.1170, subp. 5
Relative Accuracy Test Audit (RATA) Notification: due 30 days before CEMS Relative Accuracy Test Audit (RATA) .	Minn. R. 7017.1180, subp. 2
Recordkeeping: The owner or operator must retain records of all CEMS monitoring data and support information for a period of five years from the date of the monitoring sample, measurement or report. Records shall be kept at the source.	Minn. R. 7017.1130; 40 CFR Section 60.7(f)

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-22**

08/17/11

Facility Name: Lamb Weston/RDO Frozen

Permit Number: 05700006 - 003

Subject Item: MR 004 Nebraska Boiler NOX Monitor**Associated Items:** CM 002 Nebraska Boiler: 0.10 lbs NOx/mmBtu, EU001, 30 DRA

EU 001 Nebraska Boiler

What to do	Why to do it
CEMS Monitor Design: Each CEMS shall be designed to complete a minimum of one cycle of sampling, analyzing, and data recording in each 15-minute period.	40 CFR Section 60.13(e)(2)
Continuous Operation: CEMS must be operated and data recorded during all periods of operation of EU001, including periods of emission unit start-up, shutdown, or malfunction, except for periods of acceptable monitor downtime. This requirement applies whether or not a numerical emission limit applies during these periods. A CEMS must not be bypassed except in emergencies where failure to bypass would endanger human health, safety, or plant equipment.	40 CFR Section 60.13(e), Minn. R. 7017.1090, subp. 1; 40 CFR Section 60.48b(b)(c); Minn. R. 7011.0565
Monitoring Data: Reduce all NOX data to 1-hour averages, in accordance with 40 CFR Section 60.13(h). 1-hour averages shall be computed from four or more data points equally spaced over each 1-hour period.	40 CFR Section 60.13(h) regarding continuous monitoring systems other than COMS.
The 1-hour average NOX emission rates measured by the CEMS shall be expressed in lb/MMBtu heat input and shall be used to calculate the average emission rates under 40 CFR Section 60.44b. The 1-hour averages shall be calculated using the data points required under 40 CFR Section 60.13(h)(2).	40 CFR Section 60.48b(b)(d); Minn. R. 7011.0565
QA Plan: Develop and implement a written quality assurance plan that covers each CEMS. The plan shall be on site and available for inspection within 30 days after monitor certification. The plan shall contain all of the information required by 40 CFR pt. 60, Appendix F, Section 3. The plan shall include the manufacturer's spare parts list for the CEMS and require that those parts be kept at the facility unless the Commissioner gives written approval to exclude specific spare parts from the list.	Minn. R. 7017.1170, subp. 2; 40 CFR pt. 60, App. F; section 3
CEMS QA/QC: The owner or operator of an affected facility is subject to the performance specifications listed in 40 CFR pt. 60, Appendix B and shall operate, calibrate, and maintain each CEMS according to the QA/QC procedures in 40 CFR pt. 60, Appendix F as amended and maintain a written QA/QC program available in a form suitable for inspection.	40 CFR pt. 60, Appendix F; 40 CFR Section 60.13(a)
CEMS Daily Calibration Drift Test: Check the zero (low level value between 0 and 20 percent of span value) and span (50 to 100 percent of span value) calibration drifts at least once daily. The zero and span must, at a minimum, be adjusted whenever the drift exceeds two times the limit specified in 40 CFR pt. 60, Appendix B. 40 CFR pt. 60, Appendix F shall be used to determine out-of-control periods for CEMS.	40 CFR pt. 60, Appendix F, section 4.1; 40 CFR Section 60.13(d)(1) regarding CEMS; Minn. R. 7017.1170, subp. 3
The NOX span value shall be 500 ppm, rounded to the nearest 500 ppm. As an alternative, the Permittee may elect to use the NOX span values determined according to section 2.1.2 in Appendix A to Part 75, rounded according to that section.	40 CFR Section 60.48b(e)(2) and (3); Minn. R. 7011.0565
Cylinder Gas Audit (CGA): due before end of each three out of four calendar quarters following Permit Issuances but no more than three quarters in succession. A CGA is not required during any calendar quarter in which a RATA was performed.	40 CFR pt. 60, Appendix F, section 5.1.2; Minn. R. 7017.1170, subp. 4
CEMS Relative Accuracy Test Audit (RATA): due before end of every one out of four calendar quarters following Permit Issuance.	40 CFR pt. 60, Appendix F, section 5.1.1; Minn. R. 7017.1170, subp. 5
Relative Accuracy Test Audit (RATA) Notification: due 30 days before CEMS Relative Accuracy Test Audit (RATA) .	Minn. R. 7017.1180, subp. 2
Recordkeeping: The owner or operator must retain records of all CEMS monitoring data and support information for a period of five years from the date of the monitoring sample, measurement or report. Records shall be kept at the source.	Minn. R. 7017.1130; 40 CFR Section 60.7(f)

TABLE B: SUBMITTALS**B-1** 08/17/11

Facility Name: Lamb Weston/RDO Frozen
Permit Number: 05700006 - 003

Also, where required by an applicable rule or permit condition, send to the Permit Document Coordinator notices of:

- accumulated insignificant activities,
- installation of control equipment,
- replacement of an emissions unit, and
- changes that contravene a permit term.

Send submittals that are required to be submitted to the U.S. EPA regional office to:

Mr. George Czerniak
Air and Radiation Branch
EPA Region V
77 West Jackson Boulevard
Chicago, Illinois 60604

Each submittal must be postmarked or received by the date specified in the applicable Table. Those submittals required by parts 7007.0100 to 7007.1850 must be certified by a responsible official, defined in Minn. R. 7007.0100, subp. 21. Other submittals shall be certified as appropriate if certification is required by an applicable rule or permit condition.

Send submittals that are required by the Acid Rain Program to:

U.S. Environmental Protection Agency
Clean Air Markets Division
1200 Pennsylvania Avenue NW (6204N)
Washington, D.C. 20460

Send any application for a permit or permit amendment to:

AQ Permit Document Coordinator
Industrial Division
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155-4194

Unless another person is identified in the applicable Table, send all other submittals to:

AQ Compliance Tracking Coordinator
Industrial Division
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155-4194

Table B lists most of the submittals required by this permit. Please note that some submittal requirements may appear in Table A or, if applicable, within a compliance schedule located in Table C. Table B is divided into two sections in order to separately list one-time only and recurrent submittal requirements.

TABLE B: ONE TIME SUBMITTALS OR NOTIFICATIONS**B-2** 08/17/11

Facility Name: Lamb Weston/RDO Frozen

Permit Number: 05700006 - 003

What to send	When to send	Portion of Facility Affected
Application for Permit Reissuance	due 180 days before expiration of Existing Permit	Total Facility
Notification of compliance status	due before 07/19/2012 for the boiler tune-up requirement	GP004
Notification of compliance status	due before 07/19/2014 for the energy assessment requirement.	GP004
Subpart JJJJJ Initial Notification	due before 09/17/2011	GP004

TABLE B: RECURRENT SUBMITTALS**B-3** 08/17/11

Facility Name: Lamb Weston/RDO Frozen

Permit Number: 05700006 - 003

What to send	When to send	Portion of Facility Affected
COMS Audit Results Summary	due 30 days after end of each calendar quarter following Permit Issuance in which a Calibration Error Audit was conducted.	MR001
Cylinder Gas Audit (CGA) Results Summary	due 30 days after end of each calendar quarter following Permit Issuance in which a CGA was conducted.	MR003
Cylinder Gas Audit (CGA) Results Summary	due 30 days after end of each calendar quarter following Permit Issuance in which a CGA was conducted.	MR004
Excess Emissions/Downtime Reports (EER's)	due 30 days after end of each calendar quarter starting 05/27/2003 (Submit Deviations Reporting Form DRF-1 as amended).. The EER shall indicate all periods of monitor bypass and all periods of exceedances of the limit including exceedances allowed by an applicable standard, i.e. during startup, shutdown, and malfunctions. Excess emissions are defined as all 6-minute periods during which the average opacity exceeds the opacity standard, or any calculated 30-day rolling average NOX emission rate that exceeds the applicable emission limit.	EU001
Semiannual Deviations Report	due 30 days after end of each calendar half-year following Permit Issuance. The first semiannual report submitted by the Permittee shall cover the calendar half-year in which the permit is issued. The first report of each calendar year covers January 1 - June 30. The second report of each calendar year covers July 1 - December 31. If no deviations have occurred, the Permittee shall submit the report stating no deviations.	Total Facility
Compliance Certification	due 31 days after end of each calendar year following Permit Issuance (for the previous calendar year). The Permittee shall submit this on a form approved by the Commissioner, both to the Commissioner and to the US EPA regional office in Chicago. This report covers all deviations experienced during the calendar year.	Total Facility
Relative Accuracy Test Audit (RATA) Results Summary	due before end of each calendar year following Permit Issuance if a RATA is completed. The Results Summary is due 30 days after the end of the calendar quarter in which the RATA was complete.	MR003
Relative Accuracy Test Audit (RATA) Results Summary	due before end of each calendar year following Permit Issuance if a RATA is completed. The Results Summary is due 30 days after the end of the calendar quarter in which the RATA was complete.	MR004

Appendix B: Insignificant Activities Required to be Listed**Facility Name:** Lamb Weston/RDO Frozen**Permit Number:** 05700006-003**Insignificant Activities**

Minn. R. 7007.1300, subpart	Rule Description of the Activity	Applicable Requirement
3(E)	Storage Tanks	
	2. non-hazardous air pollutant VOC storage tanks with a combined total tankage capacity of not more than 10,000 gallons; of non-hazardous air pollutant VOCs and with a vapor pressure of not more than 1.0 psia at 60 degrees Fahrenheit. <ul style="list-style-type: none">Waste Cooking Oil Tank	Minn. R. 7011.0710/0715
3(G)	Emissions from a laboratory, as defined in the subpart. <ul style="list-style-type: none">Bacteriological lab for product and wastewater analyses	Minn. R. 7011.0510/0515 or Minn. R. 7011.0610 or Minn. R. 7011.0710/0715
3(H)	Miscellaneous:	
	3. brazing, soldering or welding equipment; <ul style="list-style-type: none">Electric welders, metal inert gas, and tungsten inert gas welders (located in the maintenance shop)	Minn. R. 7011.0710/0715
3(I)	Individual emissions units at a stationary source, each of which have a potential to emit the following pollutants in amounts less than: (1) 4,000 lbs/year of carbon monoxide; and (2) 2,000 lbs/year each of nitrogen oxide, sulfur dioxide, particulate matter, particulate matter less than ten microns, volatile organic compounds (including hazardous air pollutant-containing VOC), and ozone; and (3) 1,000 tons per year of CO ₂ e. <ul style="list-style-type: none">Potato Receiving, Sizing, Sorting, and Storing.Potato Receiving, Sizing, Sorting, and StoringChopped & Formed line PackagingDefat Shakers	Minn. R. 7011.0710/0715
3(J)	Fugitive Emissions from paved roads and parking lots.	Minn. R. 7011.0150

Minn. R. 7007.1300, subpart	Rule Description of the Activity	Applicable Requirement
4	<p>Individual emissions units at a stationary source, each of which has:</p> <p>A. Potential emissions of 5.7 pounds per hour or actual emissions of two tons per year of carbon monoxide;</p> <p>B. Potential emissions of 2.28 pounds per hour or actual emissions of one ton per year for particulate matter, particulate matter less than ten microns, nitrogen oxide, sulfur dioxide, and VOCs; and</p> <p>C. For hazardous air pollutants, emissions units with:</p> <p>(1) potential emissions of 25 percent or less of the hazardous air pollutant thresholds listed in subp. 5; or</p> <p>(2) combined HAP actual emissions of one ton per year unless the emissions unit emits one or more of the HAPs listed in this subpart.</p> <p>D. Potential emissions up to 10,000 tons per year or actual emissions up to 1,000 tons per year CO₂e.</p> <ul style="list-style-type: none"> • Line 1 Dryer • Line 2 Dryer 	Minn. R. 7011.0710/0715

Appendix C: GP003 CO₂e Calculations

Facility Name: Lamb Weston/RDO Frozen

Permit Number: 05700006-003

Use the following equations to calculate Carbon Dioxide Equivalent (CO₂e) emissions for compliance with the GP003 CO₂e limit.

$$\text{CO}_2\text{e} = [(\text{CH}_4(\text{NG}) + \text{CH}_4(\text{B}) + \text{CH}_4(\text{DO})) \times \text{GWP}_{\text{CH}_4}] + [(\text{N}_2\text{O}(\text{NG}) + \text{N}_2\text{O}(\text{B}) + \text{N}_2\text{O}(\text{DO})) \times \text{GWP}_{\text{N}_2\text{O}}] + \text{CO}_2(\text{NG}) + \text{CO}_2(\text{B}) + \text{CO}_2(\text{DO})$$

CO₂e₍₁₂₎ = the sum of the values of CO₂e calculated over the previous 12 calendar months (12- month rolling sum)

$$\text{CH}_4(\text{NG}) = \text{Q}_{\text{NG}} \times \text{EF}_{\text{CH}_4\text{-NG}} \div 2000$$

$$\text{CH}_4(\text{B}) = \text{Q}_{\text{B}} \times \text{EF}_{\text{CH}_4\text{-B}} \div 2000$$

$$\text{CH}_4(\text{DO}) = \text{Q}_{\text{DO}} \times \text{EF}_{\text{CH}_4\text{-DO}} \div 2000$$

$$\text{N}_2\text{O}(\text{NG}) = \text{Q}_{\text{NG}} \times \text{EF}_{\text{N}_2\text{O-NG}} \div 2000$$

$$\text{N}_2\text{O}(\text{B}) = \text{Q}_{\text{B}} \times \text{EF}_{\text{N}_2\text{O-B}} \div 2000$$

$$\text{N}_2\text{O}(\text{DO}) = \text{Q}_{\text{DO}} \times \text{EF}_{\text{N}_2\text{O-DO}} \div 2000$$

$$\text{CO}_2(\text{NG}) = \text{Q}_{\text{NG}} \times \text{EF}_{\text{CO}_2\text{-NG}} \div 2000$$

$$\text{CO}_2(\text{B}) = \text{Q}_{\text{B}} \times \text{EF}_{\text{CO}_2\text{-B}} \div 2000$$

$$\text{CO}_2(\text{DO}) = \text{Q}_{\text{DO}} \times \text{EF}_{\text{CO}_2\text{-DO}} \div 2000$$

Where:

CO₂e = the quantity of CO₂e emitted during the previous calendar month (tons)

CH₄(NG) = the quantity of methane generated by combustion of natural gas during the previous month (tons)

CH₄(B) = the quantity of methane generated by combustion of biogas during the previous month (tons)

CH₄(DO) = the quantity of methane generated by combustion of distillate oil during the previous month (tons)

N₂O(NG) = the quantity of nitrous oxide generated by combustion of natural gas during the previous month (tons)

N₂O(B) = the quantity of nitrous oxide generated by combustion of biogas during the previous month (tons)

N₂O(DO) = the quantity of nitrous oxide generated by combustion of distillate oil during the previous month (tons)

Q_{NG} = the quantity of natural gas combusted during the previous calendar month (mmcf)

Q_B = the quantity of biogas combusted during the previous calendar month (mmcf)

Q_{DO} = the quantity of distillate oil combusted during the previous calendar month (1000 gallons¹)

EF_{CH₄-NG} = the MPCA-approved emission factor for calculating methane emissions from combustion of natural gas. At the time of permit issuance, the MPCA-approved emission factor is 2.27 lb/mmcf.² If testing is done, and use of the tested values would result in a higher CH₄ emission factor, the higher emission factor should be used. If testing results in a lower CH₄ emission factor, the emission factor in the permit (the higher factor) should be used until a permit amendment is issued authorizing use of the lower emission factor. If Table C-2 to Subpart C of 40 CFR Part 98 is changed to reflect a different emission factor, the revised emission factor should be used in the derivation of the emission factor used herein.

EF_{CH₄-B} = the MPCA-approved emission factor for calculating methane emissions from combustion of biogas. At the time of permit issuance, the MPCA-approved emission factor is 3.70 lb/mmcf.³ If testing is done, and use of the tested values would result in a higher CH₄ emission factor, the higher emission factor should be used. If testing results in a lower CH₄ emission factor, the emission factor in the permit (the higher factor) should be used until a permit amendment is issued authorizing use of the lower emission factor. If Table C-2 to Subpart C of 40 CFR Part 98 is changed to reflect a different emission factor, the revised emission factor should be used in the derivation of the emission factor used herein.

¹ 20,000 gallons would be 20 in units of "1000 gallons"

² Converted from the value provided in Table C-2 to Subpart C of 40 CFR Part 98 (0.001 kg/MMBtu), using conversion factors of 0.001028 MMBtu/ft³ and 2.20462 kg/lb

³ Converted from the value provided in Table C-2 to Subpart C of 40 CFR Part 98 (0.0032 kg/MMBtu), using conversion factors of 0.000525 MMBtu/ft³ and 2.20462 kg/lb

- EF_{CH_4-DO} = the MPCA-approved emission factor for calculating methane emissions from combustion of distillate oil. At the time of permit issuance, the MPCA-approved emission factor is 0.043 lb/1000 gallons.⁴ If testing is done, and use of the tested values would result in a higher CH_4 emission factor, the higher emission factor should be used. If testing results in a lower CH_4 emission factor, the emission factor in the permit (the higher factor) should be used until a permit amendment is issued authorizing use of the lower emission factor. If Table C-2 to Subpart C of 40 CFR Part 98 is changed to reflect a different emission factor, the revised emission factor should be used in the derivation of the emission factor used herein.
- EF_{N_2O-NG} = The MPCA-approved emission factor for calculating nitrous oxide emissions from combustion of natural gas. At the time of permit issuance, the MPCA-approved emission factor is 0.227 lb/mmcf.² If testing is done, and use of the tested values would result in a higher N_2O emission factor, the higher emission factor should be used. If testing results in a lower N_2O emission factor, the emission factor in the permit (the higher factor) should be used until a permit amendment is issued authorizing use of the lower emission factor. If Table C-2 to Subpart C of 40 CFR Part 98 is changed to reflect a different emission factor, the revised emission factor should be used in the derivation of the emission factor used herein.
- EF_{N_2O-B} = The MPCA-approved emission factor for calculating nitrous oxide emissions from combustion of biogas. At the time of permit issuance, the MPCA-approved emission factor is 0.729 lb/mmcf.³ If testing is done, and use of the tested values would result in a higher N_2O emission factor, the higher emission factor should be used. If testing results in a lower N_2O emission factor, the emission factor in the permit (the higher factor) should be used until a permit amendment is issued authorizing use of the lower emission factor. If Table C-2 to Subpart C of 40 CFR Part 98 is changed to reflect a different emission factor, the revised emission factor should be used in the derivation of the emission factor used herein.
- EF_{N_2O-DO} = The MPCA-approved emission factor for calculating nitrous oxide emissions from combustion of distillate oil. At the time of permit issuance, the MPCA-approved emission factor is 0.00059 lb/1000 gallons.⁴ If testing is done, and use of the tested values would result in a higher N_2O emission factor, the higher emission factor should be used. If testing results in a lower N_2O emission factor, the emission factor in the permit (the higher factor) should be used until a permit amendment is issued authorizing use of the lower emission factor. If Table C-2 to Subpart C of 40 CFR Part 98 is changed to reflect a different emission factor, the revised emission factor should be used in the derivation of the emission factor used herein.
- EF_{CO_2-NG} = The MPCA-approved emission factor for calculating carbon dioxide emissions from combustion of natural gas. At the time of permit issuance, the MPCA-approved emission factor is 120161.8 lb/mmcf.⁵ If testing is done, and use of the tested values would result in a higher CO_2 emission factor, the higher emission factor should be used. If testing results in a lower CO_2 emission factor, the emission factor in the permit (the higher factor) should be used until a permit amendment is issued authorizing use of the lower emission factor. If Table C-1 to Subpart C of 40 CFR Part 98 is changed to reflect a different emission factor, the revised emission factor should be used in the derivation of the emission factor used herein.
- EF_{CO_2-B} = The MPCA-approved emission factor for calculating carbon dioxide emissions from combustion of biogas. At the time of permit issuance, the MPCA-approved emission factor is 60267.1 lb/mmcf.⁵ If testing is done, and use of the tested values would result in a higher CO_2 emission factor, the higher emission factor should be used. If testing results in a lower CO_2 emission factor, the emission factor in the permit (the higher factor) should be used until a permit amendment is issued authorizing use of the lower emission factor. If Table C-1 to Subpart C of 40 CFR Part 98 is changed to reflect a different emission factor, the revised emission factor should be used in the derivation of the emission factor used herein.
- EF_{CO_2-DO} = The MPCA-approved emission factor for calculating carbon dioxide emissions from combustion of distillate oil. At the time of permit issuance, the MPCA-approved emission factor is 22501.4 lb/1000 gallons.⁵ If testing is done, and use of the tested values would result in a higher CO_2 emission factor, the higher emission factor should be used. If testing results in a lower CO_2 emission factor, the emission factor in the permit (the higher factor) should be used until a permit amendment is issued authorizing use of the lower emission factor. If Table C-1 to Subpart C of 40 CFR Part 98 is changed to reflect a different emission factor, the revised emission factor should be used in the derivation of the emission factor used herein.
- GWP_{CH_4} = The global warming potential of methane (unitless). At the time of permit issuance, the GWP of methane is 21.⁶ If Subpart A of 40 CFR Part 98 is changed to reflect a different GWP, the revised GWP should be used.
- GWP_{N_2O} = The global warming potential of nitrous oxide (unitless). At the time of permit issuance, the GWP of nitrous oxide is 310.⁶ If Subpart A of 40 CFR Part 98 is changed to reflect a different GWP, the revised GWP should be used.

⁴ Converted from the value provided in Table C-2 to Subpart C of 40 CFR Part 98 (0.003 kg/MMBtu), using conversion factors of 0.138 MMBtu/gallon and 2.20462 kg/lb

⁵ Converted from the value provided in Table C-1 to Subpart C of 40 CFR Part 98 (0.001 kg/MMBtu), using conversion factors of 0.001028 MMBtu/ft³ and 2.20462 kg/lb

⁶ Table A-1 to Subpart A of 40 CFR Part 98

Appendix D: GP001 SO₂ Calculations

Facility Name: Lamb Weston/RDO Frozen

Permit Number: 05700006-003

Use the following equations to calculate Sulfur Dioxide (SO₂) emissions for compliance with the GP001 SO₂ limit.

$$SO_2 = [(Q_{NG} \times EF_{NG}) + (Q_B \times EF_B) + (Q_{DO} \times EF_{DO} \times S_{DO})] \div 2000$$

SO₂(₁₂) = the sum of the values of SO₂ calculated over the previous 12 calendar months (12- month rolling sum)

Where:

- SO₂ = the quantity of SO₂ emitted during the previous calendar month (tons)
- Q_{NG} = the quantity of natural gas combusted during the previous calendar month (mmcf)
- Q_B = the quantity of biogas combusted during the previous calendar month (mmcf)
- Q_{DO} = the quantity of distillate oil combusted during the previous calendar month (1000 gallons⁷)
- S_{DO} = the sulfur content of the fuel oil combusted during the previous calendar month (weight percent⁸). If the sulfur content of the fuel oil in the tank varied over the month (such as if the oil in the tank is from 2 or more separate deliveries of oil with different sulfur contents), calculate separate a "Q_{DO} x EF_{DO} x S_{DO}" for each quantity of fuel oil with a different sulfur content.
- EF_{NG} = the MPCA-approved emission factor for calculating SO₂ emissions from combustion of natural gas. At the time of permit issuance, the MPCA-approved emission factor is 0.6 lb/mmcf.⁹ If Table 1.4-1 of EPA's AP-42 is modified, then use the most recent SO₂ factor published there. If testing is done, and use of the tested values would result in a higher SO₂ emission factor, the higher emission factor should be used. If testing results in a lower SO₂ emission factor, the emission factor in the permit (the higher factor) should be used until a permit amendment is issued authorizing use of the lower emission factor.
- EF_B = the MPCA-approved emission factor for calculating SO₂ emissions from combustion of biogas. At the time of permit issuance, the MPCA-approved emission factor is 209 lb/mmcf.¹⁰ If testing is done, and use of the tested values would result in a higher SO₂ emission factor, the higher emission factor should be used. If testing results in a lower SO₂ emission factor, the emission factor in the permit (the higher factor) should be used until a permit amendment is issued authorizing use of the lower emission factor.
- EF_{DO} = the MPCA-approved emission factor for calculating SO₂ emissions from combustion of distillate oil. At the time of permit issuance, the MPCA-approved emission factor is 142 lb/1000 gallons.¹¹ If Table 1.3-1 of EPA's AP-42 is modified, then use the most recent SO₂ factor published there. If testing is done, and use of the tested values would result in a higher SO₂ emission factor, the higher emission factor should be used. If testing results in a lower SO₂ emission factor, the emission factor in the permit (the higher factor) should be used until a permit amendment is issued authorizing use of the lower emission factor.

⁷ 20,000 gallons would be 20 in units of "1000 gallons"

⁸ A sulfur content of 0.15% by weight would be "0.15" in the calculation

⁹ AP-42 Table 1.4-1

¹⁰ Number provided by applicant, converted from measured H₂S ppm

¹¹ AP-42 Table 1.3-1

TECHNICAL SUPPORT DOCUMENT
For
AIR EMISSION PERMIT NO. 05700006-003

This Technical Support Document (TSD) is intended for all parties interested in the permit and to meet the requirements that have been set forth by the federal and state regulations (40 CFR § 70.7(a)(5) and Minn. R. 7007.0850, subp. 1). The purpose of this document is to provide the legal and factual justification for each applicable requirement or policy decision considered in the determination to issue the permit.

1. General Information

1.1 Applicant and Stationary Source Location:

Table 1. Applicant and Source Address

Applicant/Address	Stationary Source/Address (SIC Code: 2099)
Lamb Weston/RDO Frozen PO Box 552 Park Rapids, MN 56470	Lamb Weston/RDO Frozen 3704 Park Avenue South Park Rapids Hubbard County
Contact: Brian Flynn Phone: 218-732-2106	

1.2 Facility Description

The stationary source is a potato processing plant in Park Rapids, Minnesota. The plant was constructed in 1981, and the present owner Lamb Weston/RDO Frozen purchased the plant in 1992 for the production of frozen french fries.

The primary emission sources at the facility are the four fryers, which are controlled by wet scrubbers, and three boilers which supply steam to the frozen french fry processing plant. The boilers can burn distillate oil and natural gas. The largest boiler (EU001) is subject to NSPS Subpart Db, Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units. The two smaller boilers (EU002 and EU003) are subject to Minnesota Standards of Performance for Existing Indirect Heating Equipment. All three boilers are subject to 40 CFR Part 63, Subpart JJJJJ, National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers. Other facility equipment is subject to Minnesota Standards of Performance.

The facility also includes several emission units which are classified as insignificant activities. These are included in Appendix B to the permit, and are described later in this technical support document.

1.3 Description of any Changes Allowed with this Permit Issuance

No changes to the facility are authorized by this permit action. Changes to the permit include the following:

- Because of changes in regulations governing greenhouse gases, some emission units previously considered insignificant activities are now included in the permit: biogas flare, and six air makeup units.
- A limit on greenhouse gas emissions (as carbon dioxide equivalent, CO₂e) was added to the permit (GP003), because the Permittee wishes to remain a non-major source under New Source Review.
- The "Title I" limits on the fryer particulate emissions were removed. These limits were nothing more than the allowed emission rates (from Minn. R. 7011.0715) for the fryers, assuming certain operating parameters. These limits were replaced with the standard Minn. R. 7011.0715 limits and citations, and an overall production limit from the fryers as a group (GP002).
- The NSPS Subpart Db requirements for EU001 were corrected.

- Requirements of the boiler area source standard (40 CFR Part 63, Subpart JJJJJ) were added to the permit (GP004).
- CAM requirements were added to the permit.
- A new group was added (GP005) to list the applicable Minn. Rule standard for the air makeup units.
- CE004 was added to the permit, as a replacement for CE001. The MPCA was notified of this change, made under the provisions of Minn. R. 7007.1150(C), on August 12, 2008.
- Related to this change, it was noted that CE004 is a spray tower type of wet scrubber, "the same design as the other scrubbers on site." The other scrubbers (CE002 and CE003) had generically been called "wet scrubbers;" that designation was changed to "spray tower" as part of this permit action.
- The permit was updated to reflect that the NO_x monitor on EU001 was replaced. MR004 replaced MR002.
- The permit language was brought up-to-date with current standards and practices.

1.4 Description of All Amendments Issued Since the Issuance of the Last Total Facility Permit

Permit Number and Issuance Date	Action Authorized
05700006-002; September 4, 2003	Administrative Amendment to correct an error in the Part 70 permit
No permit issued, August 8, 2008	Notification of replacement of control equipment

1.5 Facility Emissions:

Table 2. Total Facility Potential to Emit Summary

	PM tpy	PM ₁₀ tpy	PM _{2.5} tpy	SO ₂ tpy	NO _x tpy	CO tpy	VOC tpy	CO ₂ e tpy	Single HAP tpy	All HAPs tpy
Total Facility Limited Potential Emissions	198.3	178.1	170.4	240.1	202.4	82.2	10.2	95000	1.42	1.49
Total Facility Actual Emissions (2009)	81.3 ⁽²⁾	73.5 ⁽²⁾	NR ⁽¹⁾	33.6	27.8	27.7	4.3	NR ⁽¹⁾	NR ⁽¹⁾	

⁽¹⁾ PM_{2.5}, CO₂e, and HAPs not reported in emission inventory

⁽²⁾ This is the actual emissions calculated based on actual throughput reported in the 2009 emission inventory, using the emission factors and control efficiencies approved through this permit action.

Table 3. Facility Classification

Classification	Major/Affected Source	Synthetic Minor	Minor
PSD		X	
Part 70 Permit Program	X		
Part 63 NESHAP			X

2. Regulatory and/or Statutory Basis

New Source Review

The facility is a non-major source under New Source Review regulations, due to federally enforceable conditions contained in the permit. No changes to the facility are authorized by this permit.

Part 70 Permit Program

The facility is a major source under the Part 70 permit program.

New Source Performance Standards (NSPS)

Boiler EU001 is subject to NSPS Subpart Db, Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

The facility is an area source of HAP emissions. The boilers will be subject to 40 CFR Part 63, Subpart JJJJJ, National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers.

Compliance Assurance Monitoring (CAM)

The table below lists the sources which are subject to CAM, whether the source is a large pollutant specific emission unit (PSEU), and the monitoring for the applicable pollutants.

Table 4. CAM Summary

Unit	Control	CAM Applicability	Pollutant	Monitoring
EU005	CE004 Spray tower	Other	PM	Scrubber fluid pressure, once per 24 hours
EU009	CE003 Spray tower	Other	PM	Scrubber fluid pressure, once per 24 hours

For other PSEUs (not large), records must be made at a minimum of once per 24 hours. See Attachment 3 to this document for the CAM Plan submitted by the applicant.

Environmental Review & AERA

There is no construction associated with this permit action, therefore Environmental Review and AERA are not applicable.

Protection of Stratospheric Ozone

The Permittee indicated in their original Title V permit application that they use ozone depleting substances. They may be subject to 40 CFR Part 82, Protection of Stratospheric Ozone. The MPCA does not have delegation to enforce this regulation.

Chemical Accident Prevention Provisions

The Permittee indicated in their original Title V permit application that they use substances that may subject them to the requirements of 40 CFR Part 68, Chemical Accident Prevention Provisions. At the time they become subject to this regulation, they will be required to submit an Accidental Release Prevention Plan.

Minnesota State Rules

Portions of the facility are subject to the following Minnesota Standards of Performance:

- Minn. R. 7011.0515 Standards of Performance for New Indirect Heating Equipment

- Minn. R. 7011.0715 Standards of Performance for Post-1969 Industrial Process Equipment

Table 5. Regulatory Overview of Facility

Level	Applicable Regulations	Comments:
EU 001	40 CFR pt. 60, subp. Db;	<p>Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units. Determination of applicable limits from rule:</p> <ul style="list-style-type: none"> • The unit was constructed in 1994; • The heat input capacity is 153 MMBtu/yr; and • The fuels burned are natural gas, biogas, and distillate oil • The unit is a high heat release rate boiler. <p>Initial performance test for NO_x has been completed (1998) and CEMS are now in use. COMS are not required under 40 CFR 60.48b(a) because 40 CFR 60.48(j)(2) applies (combusts only gaseous and non-residual liquid fuels). As allowed under 40 CFR 60.47b(f), SO₂ CEMS under 40 CFR 60.47b(a) is not required because they combust very low sulfur fuel oil and keep records under 40 CFR 60.49b(r).</p>
EU002, EU003, GP005 (EU011, EU012, EU013, EU014, EU015, EU016)	Minn. R. 7011.0515	<p>Standards of Performance for Existing Indirect Heating Equipment. Determination of applicable limit from rule:</p> <ul style="list-style-type: none"> • the units were all constructed in after January 31, 1977; • the facility is located outside the cities in Table I; • the unit capacities are all less than 250 MMBtu/hr; and • the facility has less than 250 MMBtu/hr of indirect heating equipment.
GP001 (EU001, EU002, EU003, EU017)	Title I limits to avoid 52.21 major source status	The facility has accepted a limit on sulfur dioxide (SO ₂), to maintain emissions below major source thresholds for New Source Review.
GP002 (EU005, EU006, EU009, EU010)	Minn. R. 7011.0715	Standards of Performance for Pre 1969 Industrial Process Equipment. Per MPCA guidance, this rule applies in addition to the NESHAP.
GP003 (EU002, EU003, EU011, EU012, EU013, EU014, EU015, EU016, EU017)	Title I limits to avoid 52.21 major source status	The facility has accepted a limit on greenhouse gas emissions, calculated as carbon dioxide equivalent (CO ₂ e), to maintain emissions below major source thresholds for New Source Review.
GP004	40 CFR Part 63, Subpart	National Emission Standards for Hazardous Air Pollutants for Area

Level	Applicable Regulations	Comments:
	JJJJJ	Sources: Industrial, Commercial, and Institutional Boilers. The facility operates gas and distillate fired boilers at an area HAP source. Under Subpart JJJJJ, the boilers are subject only to biennial tune-ups and a one-time energy assessment.

3. Technical Information

3.1 Calculations of Potential to Emit

Attachment 1 contains detailed spreadsheets and supporting information prepared by the MPCA and the Permittee, as well as a summary of the facility's potential to emit and actual emissions for 2009.

3.2 Periodic Monitoring and CAM

In accordance with the Clean Air Act, it is the responsibility of the owner or operator of a facility to have sufficient knowledge of the facility to certify that the facility is in compliance with all applicable requirements.

For CAM, the Permittee submitted a CAM proposal as required by 40 CFR § 64.3. It can be found in Attachment 3 to this TSD. Further discussion of decisions about CAM can be found in Table 6.

In evaluating the monitoring included in the permit, the MPCA considers the following:

- The likelihood of violating the applicable requirements;
- Whether add-on controls are necessary to meet the emission limits;
- The variability of emissions over time;
- The type of monitoring, process, maintenance, or control equipment data already available for the emission unit;
- The technical and economic feasibility of possible periodic monitoring methods; and
- The kind of monitoring found on similar units elsewhere.

Table 6 summarizes the periodic monitoring requirements for those emission units for which the monitoring required by the applicable requirement is nonexistent or inadequate or where CAM applies.

Table 6. Periodic Monitoring

Level	Requirement (basis)	Additional Monitoring	Discussion
EU001	NO _x : ≤ 0.2 lb/MMBtu heat input (NSPS Subpart Db)	NO _x CEMS	As required by NSPS. Initial performance testing for NO _x was completed in 1998.
	SO ₂ : ≤ 0.2 lb/MMBtu (30-day average) heat input when burning oil Sulfur content: ≤ 0.5% by weight (NSPS Subpar	Monitoring and recordkeeping of sulfur content of distillate oil Calculation of 30-day average SO ₂ emissions	NSPS defines very low sulfur oil as having a sulfur content less than 0.5% by weight and allows fuel certifications as compliance demonstration. NSPS does not include compliance demonstration for the SO ₂ emission limit; the requirement to calculate and record the 30 day averages was added through this permit action.

Level	Requirement (basis)	Additional Monitoring	Discussion
	Db)		
	Opacity: $\leq 20\%$ with excursions (NSPS Subpart Db)	COMS	
EU002, EU003, GP005 (EU011 – EU016) (Indirect Heating Equipment)	PM: ≤ 0.40 lb/MMBtu heat input (Minn. R. 7011.0515)	None	Potential emissions of the boilers (EU002 and EU003) is approximately 0.024 based on capacity and allowed fuels. Potential emissions of the air make-up units (EU011 – EU016) are approximately 0.0074 lb/MMBtu based on capacities and allowed fuels. Non-compliance with the standard is unlikely for any of these units.
GP001 (boilers and flare, EU001, EU002, EU003, EU017)	SO ₂ e: ≤ 240 tpy on a 12-month rolling sum basis (Title I limit)	Daily recordkeeping of fuel usage Monthly calculation of 12-month rolling sum	Emissions calculated monthly using actual quantities of fuel used and actual sulfur content of biogas and fuel oil.
GP002 (Fryers, EU005, EU006, EU009, EU010)	PM: variable with air flow and process weight rate Opacity: $\leq 20\%$ (Minn. R. 7011.0715)	Proper control equipment O&M.	Potential stack emissions based on equipment capacity, published emission factors (AP-42), and control efficiencies equivalent to what is allowed in Minn. R. 7011.0070 (facility is not subject to control equipment rule, but the rule is used as justification for the efficiencies provided by the permit), are approximately 76% of the allowed limit for EU005 and EU009, and approximately 11% of the allowed limit for EU006 and EU010. In addition, proper operation of the control equipment is required in conjunction with the process throughput limit the Permittee is accepting to remain a minor source under NSR. EU005 and EU009 are other PSEUs, so the PM/PM ₁₀ control equipment is subject to CAM, subject to monitoring once each 24 hours.
GP003 (all fuel combustion equipment)	CO ₂ e: ≤ 95000 tpy on a 12-month rolling sum basis (Title I limit)	Daily recordkeeping of fuel usage Monthly calculation of 12-month rolling sum	This limit effectively limits the potential emissions of all pollutants except SO ₂ to below major source thresholds.

3.3 Insignificant Activities

The facility has several operations which are classified as insignificant activities. These are listed in Appendix B to the permit.

The permit is required to include periodic monitoring for all emissions units, including insignificant activities, per EPA guidance. The insignificant activities at this Facility are only subject to general applicable requirements. Using the criteria outlined earlier in this TSD, the following table documents the justification why no additional periodic monitoring is necessary for the current insignificant activities. See Attachment 1 of this TSD for PTE information for the insignificant activities.

Table 7. Insignificant Activities

Insignificant Activity	General Applicable Emission limit	Discussion
Emissions from a laboratory, as defined in Minn. R. 7007.1300, subp. 3(G)	PM, variable depending on airflow Opacity \leq 20% (Minn. R. 7011.0710/715)	These are very small, intermittent, bench-top operations that typically do not even have any emissions. It is highly unlikely that they could violate the applicable requirement.
Non-hazardous VOC stage tanks with a combined total capacity not more than 10000 gallons	PM, variable depending on air flow Opacity < 20% (Minn. R. 0710/0715)	No particulate emissions are expected from this tank storing waste cooking oil.
Brazing, soldering or welding equipment	PM, variable depending on airflow Opacity \leq 20% (Minn. R. 7011.0710/715)	For these units, based on EPA published emissions factors, it is highly unlikely that they could violate the applicable requirement. In addition, these units are typically operated and vented inside a building, so testing for PM or opacity is not feasible.
Individual units with actual emissions less than 2000/4000 lb/year of certain pollutants, and less than 1000 tpy of CO ₂ e.	PM, variable depending on airflow Opacity \leq 20% (with exceptions) (Minn. R. 7011.0715 and Minn. R. 7011.610)	The operations that are insignificant under this category consist of potato receiving, sizing, sorting, and storing; packaging fried materials; and defat shakers. Airborne particulate matter is not expected from these operations. In addition, all of these units are operated and vented inside a building, so testing for PM or opacity is not feasible.
Fugitive Emissions from unpaved roads and parking lots	Requirement to take reasonable measures to prevent PM from becoming airborne (Minn. R. 7011.0150)	The facility roads that were previously categorized under this item have since been paved.
Individual units with <ul style="list-style-type: none"> potential emissions less than 5.7 lb/hr CO; 2.28 lb/hr other criteria pollutants; 10000 tpy CO₂e; or actual emissions less than 2 tpy CO, 	PM, variable depending on airflow Opacity \leq 20% (with exceptions) (Minn. R. 7011.0715 and Minn. R. 7011.610)	The operations that are insignificant under this category consist of potato drying. Airborne particulate matter is not expected from these operations. In addition, all of these units are operated and vented inside a building, so testing for PM or opacity is not feasible.

Insignificant Activity	General Applicable Emission limit	Discussion
1 tpy other criteria pollutants; 1000 tpy CO ₂ e		

3.4 Permit Organization

In general, the permit meets the MPCA Delta Guidance for ordering and grouping of requirements. One area where this permit deviates slightly from Delta guidance is in the use of appendices. While appendices are fully enforceable parts of the permit, in general, any requirement that the MPCA thinks should be tracked (e.g., limits, submittals, etc.), should be in Table A or B. The main reason is that the appendices are word processing sections and are not part of the tracking system. Violation of the appendices can be enforced, but the computer system will not automatically generate the necessary enforcement notices or documents. Staff must generate these.

3.5 Comments Received

Public Notice Period: 6/26/2011 – 7/25/2011

EPA 45-day Review Period: 6/26/2011 – 8/9/2011

Two comment letters were received during the public notice period. The first comment letter was received from Lac Vieux Desert Band of Lake Superior Chippewa Indians, and stated that the tribe has no interest in the draft/proposed permit. The second comment letter (email) was received from the consultant acting on behalf of the Permittee, and pointed out typographical errors in the permit. No comment was made on the content of the permit. The typographical errors have been corrected. No other changes were made to the draft/proposed permit. The two comment documents are included in Attachment 4.

4. Permit Fee Assessment

Example 1: This permit action is the reissuance of an individual Part 70; therefore, no application fees apply under Minn. R. 7002.0016, subp. 1.

5. Conclusion

Based on the information provided by Lamb Weston/RDO Frozen, the MPCA has reasonable assurance that the proposed operation of the emission facility, as described in the Air Emission Permit No. 05700006-003 and this TSD, will not cause or contribute to a violation of applicable federal regulations and Minnesota Rules.

Staff Members on Permit Team:

- Toni Volkmeier (permit engineer)
- Rachel Studanski (enforcement)
- Sean O'Connor (stack testing/CEMS)
- Amrill Okonkwo (peer reviewer)
- Laurie O'Brien (administrative support)

AQ File No. 1771; DQ 1775

Attachments:

1. PTE Summary and Calculation Spreadsheets
2. Facility Description and CD-01 Forms
3. CAM Plan
4. Comment Letters