



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502

C.L. "Butch" Otter, Governor  
Toni Hardesty, Director

November 15, 2007

**Certified Mail No. 7102 0243 6844 0000 0816**

Trace McCune, Plant Manager  
Idaho Fresh Pak  
138 South Custer Ave.  
Glenns Ferry, Idaho 83623

RE: Facility ID No. 039-00027, Idaho Fresh Pak, Inc., Glenns Ferry  
Final Permit Letter

Dear Mr. McCune:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-060053 to Idaho Fresh Pak, Inc. for two flaker drum dryers at its Glenns Ferry facility, in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho).

This permit is based on your permit application received on October 10, 2006. This permit is effective immediately. This permit does not release Idaho Fresh Pak from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Pursuant to General Provision 5 of your permit, it is required that Construction and Operation Notification be provided. Please provide this information as listed to DEQ's Boise Regional Office, 1445 N. Orchard, Boise, ID 83706, Fax (208) 373-0287.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Thomas Krinke, Air Quality Science Officer, at (208) 373-0550 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any other staff responsible for day-to-day compliance with permit conditions.

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Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to contact Robert Baldwin at (208) 373-0502 or robert.baldwin@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in cursive script, appearing to read "Mike Simon".

Mike Simon  
Stationary Source Program Manager  
Air Quality Division

MS\REB\hp

Project No. P-060053

Enclosures

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HARD COPY TO FACILITY

en: Lenoard Herr, Regional Air Manager, Boise Regional Office  
Thomas Krinke, Air Quality Science Officer, Boise Regional Office  
Robert Baldwin, Permit Writer  
Marilyn Seymore/ Pat Rayne, AQ Division  
Stationary Source Administrative Assistant  
Faye Weber, AQ Public Comment **(If Public comment period was held)**

en-web: Laurie Kral, U.S. EPA Region 10

ec: Trace McCune, [tmccune@idahoan.com](mailto:tmccune@idahoan.com)

c: Reading File (Ltr Only)  
Source File  
Permit Binder  
Bill Rogers, Permit Coordinator (Ltr Only)  
Phyllis Heitman, AQ Division (Ltr Only)



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## Acronyms, Units, and Chemical Nomenclature

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
lb/hr	pound per hour
MMBtu	million British thermal units
PM	particulate matter
PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
T/yr	tons per year
UTM	Universal Transverse Mercator

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-060053**

<b>Permittee:</b>	Idaho Fresh Pak, Incorporated	<b>Facility ID No. 039-00027</b>
<b>Location:</b>	Glenns Ferry, Idaho	

**1. PERMIT TO CONSTRUCT SCOPE**

***Purpose***

1.1 This is the initial PTC for Flaker Drum Dryers 2 and 3.

***Regulated Sources***

1.2 Table 1.1 lists all sources of regulated emissions in this PTC.

**Table 1.1 SUMMARY OF REGULATED SOURCES**

<b>Permit Section</b>	<b>Source Description</b>	<b>Emissions Control(s)</b>
2	Flaker Drum Dryer 2	None
2	Flaker Drum Dryer 3	None
3	20.9 MM Btu/hr Cleaver Brooks boiler	None
3	13.8 MM Btu/hr Continental boiler	None

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**2. FLAKER DRUM DRYERS 2 AND 3**

**2.1 Process Description**

A flaker drum dryer is used to dry a sheet of potato flakes adhered to the inner wall of the dryer drum. As the drum rotates, steam heat drives the moisture from the sheet. Once dried, the potato flake sheet is peeled off the drum and broken into smaller pieces. The flakes are transported pneumatically to storage until transported offsite by railcar or truck. The moisture that is driven from the sheet of potato flakes is exhausted through exhaust stacks. Each flaker drum dryer has two (2) exhaust stacks. Emissions from the drum dryers are uncontrolled.

**2.2 Emissions Control Description**

**Table 2.1 FLAKER DRUM DRYER DESCRIPTIONS**

<b>Emissions Processes</b>	<b>Emissions Control Device</b>	<b>Emissions Point</b>
Flaker Drum Dryer 2	None	Two (2) exhaust stacks
Flaker Drum Dryer 3	None	Two (2) exhaust stacks

***Emissions Limits***

**2.3 Emissions Limits**

The PM<sub>10</sub> emissions from the exhaust stacks associated with Flaker Drum Dryers 2 and 3 shall not exceed any corresponding emission rate limits listed in Table 2.2. The PM<sub>10</sub> emissions limits represent the sum total of the two stacks associated with each flaker drum dryer.

**Table 2.2 FLAKER DRUM DRYERS 2 AND 3  
PM<sub>10</sub> EMISSIONS LIMITS**

<b>Source Description</b>	<b>PM<sub>10</sub></b>	
	<b>lb/hr*</b>	<b>T/yr</b>
Flaker drum dryer 2 (two stacks)	0.53	2.31
Flaker drum dryer 3 (two stacks)	0.53	2.31

\*lb/hr – average value from three source test runs

**2.4 Opacity Limit**

Emissions from the flaker drum dryers exhaust stacks, or any other stack, vent, or other functionally equivalent opening shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

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***Operating Requirements***

**2.5 Throughput Limit – Flaker Drum Dryers 2 and 3**

The dried potato flake throughput from Flaker Drum Dryers 2 and 3 shall not exceed 22,392 pounds per calendar day.

***Monitoring and Recordkeeping Requirements***

**2.6 Throughput Monitoring**

- When operating, the permittee shall monitor and record the daily dried potato flake throughput from Flaker Drum Dryers 2 and 3 to demonstrate compliance with Permit Conditions 2.3 and 2.5.
- The throughput monitoring records shall be maintained in accordance with General Provision 7.

**2.7 Performance Test**

Within 180 days of the issuance of this permit, the permittee shall conduct a performance test to measure the PM<sub>10</sub> emissions from the two exhaust stacks of Flaker Drum Dryer 2 or Flaker Drum Dryer 3. The test shall be conducted to demonstrate compliance with pound-per-hour PM<sub>10</sub> emissions limits specified in Permit Condition 2.3. The permittee is encouraged to submit a source testing protocol for approval prior to conducting the performance test.

The permittee shall conduct the test in accordance with IDAPA 58.01.01.157 and General Provision 6, and shall monitor and record the following as instructed:

- The daily throughput of the flaker drum dryers for 10 consecutive calendar days prior to the test date including the day the facility is conducting the performance testing. The calendar day throughput shall be 80% or greater of the permitted throughput in Permit Condition 2.5 during the test.

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<b>Location:</b>	Glenns Ferry, Idaho	

**3. NATURAL GAS BOILERS**

**3.1 Process Description**

Idaho Fresh Pak, Inc. has two natural gas fired boilers to supply steam for the dryers when steam from a cogeneration facility is unavailable. The 20.9 MMBtu Cleaver Brooks boiler was manufactured in 1977. The 13.8 MMBtu Continental boiler was manufactured in 1966. Neither boiler is subject to NSPS.

***Emissions Limits***

**3.2 Emissions Limit**

Particulate matter emissions from the gas-fired boilers' exhaust stack shall not exceed 0.015 grains per dry standard cubic foot of effluent gas adjusted to 3% oxygen by volume.

***Operating Requirements***

**3.3 Allowable Fuel**

The permittee shall operate the boilers on natural gas exclusively.

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**4. PERMIT TO CONSTRUCT GENERAL PROVISIONS**

***General Compliance***

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the Rules for the Control of Air Pollution in Idaho. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.

**[Idaho Code §39-101, et seq.]**
  
2. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.

**[IDAPA 58.01.01.211, 5/1/94]**
  
3. Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules and regulations.

**[IDAPA 58.01.01.212.01, 5/1/94]**

***Inspection and Entry***

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

**[Idaho Code §39-108]**

***Construction and Operation Notification***

5. The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211:
  - a. A notification of the date of initiation of construction, within five working days after occurrence;

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- b. A notification of the date of any suspension of construction, if such suspension lasts for one year or more;
- c. A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date;
- d. A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
- e. A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

**[IDAPA 58.01.01.211, 5/1/94]**

***Performance Testing***

- 6. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

**[IDAPA 58.01.01.157, 4/5/00]**

***Monitoring and Recordkeeping***

- 7. The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Records of monitoring information shall include, but not be limited to the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

**[IDAPA 58.01.01.211, 5/1/94]**

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***Excess Emissions***

8. The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

**[IDAPA 58.01.01.130-136, 4/5/00]**

***Certification***

9. All documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

**[IDAPA 58.01.01.123, 5/1/94]**

***False Statements***

10. No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.

**[IDAPA 58.01.01.125, 3/23/98]**

***Tampering***

11. No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

**[IDAPA 58.01.01.126, 3/23/98]**

***Transferability***

12. This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

**[IDAPA 58.01.01.209.06, 4/11/06]**

***Severability***

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