



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502
www.deq.idaho.gov

November 3, 2016

C.L. "Butch" Otter, Governor
John H. Tippetts, Director

Leo Herbert, Responsible Official
Idahoan Foods, LLC, Lewisville Facility
P.O. Box 130
Lewisville, ID 83431

RE: Facility ID No. 051-00017, Idahoan Foods, LLC, Lewisville Facility, Lewisville
Final Permit Letter

Dear Mr. Herbert:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P- 2010.0061 Project 61437 to Idahoan Foods, LLC, Lewisville Facility located at Lewisville for the process and operation improvement. This PTC is issued in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho) and is based on the certified information provided in your PTC application received October 8, 2014 and June 22, 2016.

This permit is effective immediately and replaces PTC No. P-2010.0061 issued on June 30, 2010. This permit does not release Idahoan Foods, LLC, Lewisville Facility from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Pursuant to the Construction and Operation Notification General Provision of your permit, it is required that construction and operation notification be provided. Please provide this information as listed to DEQ's Idaho Falls Regional Office, 900 N. Skyline Drive, Suite B, Idaho Falls, ID 83402, Fax (208) 528-2695.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Rensay Owen, Regional Air Quality manager, at (208) 528-2650 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends that 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.

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 Shawnee Chen at (208) 373-0502 or Shawnee.chen@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Simon".

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS/SYC

Permit No. P- 2010.0061 PROJ 61437

Enclosures

Air Quality
PERMIT TO CONSTRUCT

Permittee Idahoan Foods, LLC - Lewisville
Permit Number P- 2010.0061
Project ID 61437
Facility ID 051-00017
Facility Location 529 North 3500 East
Lewisville, ID 83431

Permit Authority

This permit (a) is issued according to the “Rules for the Control of Air Pollution in Idaho” (Rules), IDAPA 58.01.01.200–228; (b) pertains only to emissions of air contaminants regulated by the State of Idaho and to the sources specifically allowed to be constructed or modified by this permit; (c) has been granted on the basis of design information presented with the application; (d) does not affect the title of the premises upon which the equipment is to be located; (e) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (f) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; and (g) in no manner implies or suggests that the Idaho Department of Environmental Quality (DEQ) or its officers, agents, or employees assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment. Changes in design, equipment, or operations may be considered a modification subject to DEQ review in accordance with IDAPA 58.01.01.200–228.

Date Issued November 3, 2016



Shawnee Chen, P.E., Permit Writer



Mike Simon, Stationary Source Manager

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1. PERMIT SCOPE

Purpose

- 1.1 This is a Permit to Construct (PTC) modification for installing dryers and cyclones and for ceasing the use of fuel oil and biofuel in Boiler No.1. [11/3/2016]
- 1.2 Those permit conditions that have been modified or revised by this permitting action are identified by a date citation located directly under the permit condition and on the right hand margin.
- 1.3 This PTC replaces PTC No. P-2010.0061, issued on June 30, 2010. [11/3/2016]
- 1.4 The emission sources regulated by this permit are listed in the following table.

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Section	Source Description	Emissions Control(s)
3	<u>Boiler No. 1</u>	None
	Make/Model: Erie City	
	Serial No: 97804	
	Capacity: 54.56 MMBtu/hr	
	Fuel: Natural gas	
	Manufactured: 1968	
	<u>Boiler No. 2</u>	
	Make/Model: Cleaver Brooks/DL-76	
	Serial No.: WL 1335	
	Capacity: 84.456 MMBtu/hr and 82.8 MMcf/hr	
	Fuel: Natural gas	
	Manufactured: 1968	
<u>Boiler No. 3</u>	None	
Make/Model: Cleaver Brooks/DL-76		
Serial No.: WL 1334		
Capacity: 84.456 MMBtu/hr and 82.8 MMcf/hr		
Fuel: Natural gas		
Manufactured: 1969		

Permit Section	Source Description	Emissions Control(s)
4	<p><u>Five Dryers for Belt Drying Operation</u></p> <p><u>Proctor No. 1 (formerly No. 5)</u></p> <p>Manufacturer: Proctor & Schwartz Model: K22523 Heat Source: Natural gas Rated Heat Input: 7.44 MMBtu/hr Capacity: 291.7 lb/hr output Manufactured: 1980</p> <p><u>Proctor No. 2</u></p> <p>Manufacturer: Proctor & Schwartz Model: K97106 Heat Source: Natural gas Rated Heat Input: 6.99 MMBtu/hr Capacity: 291.7 lb/hr output Manufactured: 1998</p> <p><u>Proctor No. 4</u></p> <p>Manufacturer: Proctor & Schwartz Model: K17777 Heat Source: Steam heat Capacity: 291.7 lb/hr output and 550 lb/hr steam Manufactured: 1968</p> <p><u>Proctor No. 5 (formerly No. 6)</u></p> <p>Manufacturer: Wolverine Proctor and Schwartz Model: 37005 Heat Source: Natural gas Rated Heat Input: 10.0 MMBtu/hr Capacity: 1.17 T/hr input Manufactured: 2003</p> <p><u>Impingement Dryer No. 1</u></p> <p>Manufacturer: CPM Wolverine Proctor Model: NA Heat Source: Natural gas Rated Heat Input: 7 MMBtu/hr Capacity: 0.3125 T/hr output Manufactured: 2014</p>	None

Permit Section	Source Description	Emissions Control(s)
5	<u>Real Line 1 Dryer with Cyclone</u> Manufacturer: Idaho Steel Type: Fluidized bed dryer Rated Heat Input: 3.7 MMBtu/hr Fuel: Natural gas fired Manufactured: 1992	None (Cyclones are process equipment here.)
	<u>Real Line 2 Dryer with Cyclone</u> Manufacturer: Idaho Steel Type: Fluidized bed dryer Rated Heat Input: 3.6 MMBtu/hr Fuel: Natural gas fired Manufactured: 1993	
	<u>Real Line 3 Dryer with Cyclone</u> Manufacturer: Idaho Steel Type: Fluidized bed dryer Rated Heat Input: 7.0 MMBtu/hr Fuel: Natural gas fired Manufactured: 1999	
	<u>Real Line 4 Dryer with Cyclone</u> Manufacturer: Idaho Steel Type: Fluidized bed dryer Rated Heat Input: 7.0 MMBtu/hr Fuel: Natural gas fired Manufactured: 2003	
6	<u>Real Line 1 Vaculift (a brand name of cyclone)</u> Manufacturer: MAC Equipment Inc.	None (Cyclones are process equipment here.)
	<u>Real Line 2 Vaculift (a brand name of cyclone)</u> Manufacturer: MAC Equipment, Inc.	
	<u>Real Line 3 Vaculift</u>	<u>Real Line 3 Baghouse</u> Manufacturer: MAC Equipment, Inc. Model: 39frtc21 s/n 99frtf02004
	<u>Real Line 4 Vaculift</u>	<u>Real Line 4 Baghouse</u> Manufacturer: MAC Equipment, Inc. Model: 39rtc21sty3cg50660-001-1
6	<u>Bagroom Dust Vaculift (a brand name of cyclone)</u> Manufacturer: Idaho Fresh-Pak	None
	<u>A Small Flake Crusher Vaculift (also known as the crusher vaculift, Vaculift is a brand name of cyclone)</u> Manufacturer: MAC Equipment, Inc. Model: 39FRTC21	None
	<u>Flaker Bagger Vaculift</u> (All emissions vent to Flaker Bagger Baghouse) Manufacturer: Vaculift hg15-18-1-42sp Model: 5-668-3	<u>Flaker Bagger Baghouse</u> Manufacturer: Saunco Mfg Model: b326/6sfsb36

Permit Section	Source Description	Emissions Control(s)
	<u>Mixing Room Baghouse</u>	<u>Mixing Room Baghouse</u> (also known as baghouse package 6 or packaging baghouse No. 6) Manufacturer: Saunco Mfg Model: 6sfsb36/296
	<u>Packaging</u>	<u>Packaging Baghouse</u> Manufacturer: MAC Environment, Inc. Model: 144MCF361 Installed date: 2010
7	<u>Flaker Line 1 (Three Drum Dryers)</u> (also known as Flaker 1a, Flaker 1b, Flaker 1c) Heat Source: Steam heat Manufacturer: Hartzell Model: 35-36-ewe Maximum Capacity: 2.41 tons/hr	None
	<u>Flaker Line 2 (Three Drum Dryers)</u> (also known as Flaker 2a, 2b, and 2c) Heat Source: Steam heat Manufacturer: Hartzell Model: 35-36-ewe Maximum Capacity: 2.41 tons/hr	None
	<u>Three Flaker Line 1 Sniffer Vents</u>	<u>One Flaker Line 1 Sniffer Vent Cyclone</u> Manufacturer: Idaho Steel, ISP6000HR Installation Date: 2016 PM ₁₀ Control Efficiency: 49.5%
	<u>Three Flaker Line 2 Sniffer Vents</u>	<u>One Flaker Line 2 Sniffer Vent Cyclone</u> Manufacturer: Idaho Steel, ISP6000HR Installation Date: 2016 PM ₁₀ Control Efficiency: 49.5%
	<u>Flaker Line 1 Bins</u>	<u>One Drum Dryer Cyclone for Each of Three Drum Dryers of Flaker Line 1 Prior to the Baghouse</u> <u>Flaker Line 1 Baghouse</u> Manufacturer: MAC Equipment, Inc. Model: 98-alm-d-04-007
	<u>Flaker Line 2 Bins</u>	<u>One Drum Dryer Cyclone for Each of Three Drum Dryers of Flaker Line 2 Prior to the Baghouse</u> <u>Flaker Line 2 Baghouse</u> Manufacturer: MAC Equipment, Inc. Model: 98-alm-d-04-006
8	Baghouse O&M Manual	Required for all baghouses

[11/3/2016]

2. FACILITY-WIDE CONDITIONS

Fugitive Emissions

- 2.1** All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651. In determining what is reasonable, consideration will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of particulate matter. Some of the reasonable precautions include, but are not limited to, the following:
- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands.
 - Application, where practical, of asphalt, oil, water, or suitable chemicals to, or covering of, dirt roads, material stockpiles, and other surfaces which can create dust.
 - Installation and use, where practical, of hoods, fans, and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
 - Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts.
 - Paving of roadways and their maintenance in a clean condition, where practical.
 - Prompt removal of earth or other stored material from streets, where practical.
- 2.2** The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.
- 2.3** The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.
- 2.4** The permittee shall conduct a quarterly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

Odors

- 2.5** The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.
- 2.6** The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall, at a minimum, include the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

Visible Emissions

- 2.7 The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, NO_x, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.
- 2.8 The permittee shall conduct a monthly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. Sources that are monitored using a continuous opacity monitoring system (COMS) are not required to comply with this permit condition. The inspection shall consist of a see/no see evaluation for each potential source of visible emissions. If any visible emissions are present from any point of emission, the permittee shall either
- a) take appropriate corrective action as expeditiously as practicable to eliminate the visible emissions. Within 24 hours of the initial see/no see evaluation and after the corrective action, the permittee shall conduct a see/no see evaluation of the emissions point in question. If the visible emissions are not eliminated, the permittee shall comply with b).
- or
- b) perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20%, as measured using Method 9, for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136.

The permittee shall maintain records of the results of each visible emission inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

Open Burning

- 2.9 The permittee shall comply with the requirements of IDAPA 58.01.01.600-616, Rules for Control of Open Burning, IDAPA 58.01.01.600-623.

Reports and Certifications

- 2.10 Any reporting required by this permit, including but not limited to, records, monitoring data, supporting information, requests for confidential treatment, notifications of intent to test, testing reports, or compliance certifications, 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. Any reporting required by this permit shall be submitted to the following address:

Air Quality Permit Compliance
Department of Environmental Quality
Idaho Falls Regional Office
900 Skyline, Suite B
Idaho Falls, ID 83402
Phone: (208) 528-2650
Fax: (208) 528-2695

Fuel-burning Equipment

- 2.11** The permittee shall not discharge to the atmosphere from any fuel-burning equipment PM in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume when burning gaseous fuels.

[11/3/2016]

3. BOILERS NO. 1, NO. 2, AND NO. 3

3.1 Process Description

Idahoan Foods, LLC's boilers are used to supply steam heat to various processing equipment throughout the facility.

3.2 Emission Control Description

The emissions from the boilers are uncontrolled.

Operating Requirements

3.3 Boiler Stack Parameters

Boiler stack height, from ground level, shall be at least

- 75 feet for Boiler No. 1,
- 70 feet for Boiler No. 2, and
- 70 feet for Boiler No. 3.

[11/3/2016]

3.4 Boiler Fuel Restrictions

Boilers No. 1, No. 2 and No. 3 shall only burn natural gas.

[11/3/2016]

3.5 Combined Natural Gas Use

The fuel consumption of the three boilers combined shall not exceed 725 million standard cubic feet (MMscf) of natural gas during any consecutive 12-month period.

3.6 Boiler No. 2 and No. 3 operation requirement

The permittee shall not operate Boiler No. 2 and Boiler No. 3 simultaneously unless the economizers of Boiler No. 2 and Boiler No. 3 are bypassed.

[11/3/2016]

3.7 Boiler No. 2 and No. 3 BACT Requirement

If the permittee chooses to burn fuel other than natural gas in Boilers No. 2 and 3, the permittee shall submit a permit to construct that includes a BACT analysis for PM, PM₁₀, NO_x, and SO₂, including the information in IDAPA 58.01.01.202.c.i. This information will be used to determine BACT-equivalent emissions limitations for these pollutants.

[5/8/07]

3.8 Boiler O&M Manual

Through a prior permit requirement, the permittee shall have developed an O&M manual for each boiler. The manual shall incorporate procedures and information to demonstrate that the boilers are operated and maintained to ensure that proper combustion of all fuels used. At a minimum the following items shall be addressed in the manual:

- Include an inspection checklist which lists items that will be periodically inspected while the system is operating, including a gas analysis on O₂, CO₂, and CO and the manufacturer's recommended range for these values. Describe how often these operational inspections will be performed. These

inspections should be done at least monthly when using No. 1 distillate, No. 2 distillate, or bio-fuel (yellow grease.)

- Describe periodic planned maintenance.
- Include a requirement to have each boiler evaluated at least once per year by an authorized boiler repair representative and have any necessary repairs and tuning done within 60 days of the evaluation.

The O&M manual and records of boiler evaluations, repairs, and tuning shall be maintained on site and made available to DEQ representatives upon request.

Monitoring and Recordkeeping Requirements

3.9 Natural Gas Consumption

The permittee shall monitor and record the total amount of natural gas combusted by the boilers on a monthly basis. Each month the permittee shall calculate and record the amount of natural gas combusted over the most recent consecutive 12-month period. A compilation of the most recent two years of monitoring data shall be maintained on site and made available to DEQ representatives upon request.

3.10 Boiler No. 2 and No. 3 Operation Monitoring

The permittee shall monitor and record the beginning and ending time and dates when Boiler No. 2 and Boiler No. 3 are operating simultaneously and when the economizers are bypassed. The records shall be kept onsite and shall be made available to DEQ representative upon request.

[11/3/2016]

4. BELT DRYING OPERATION

4.1 Process Description

Five dryers are used to dry potato pieces. Proctors No. 1, No. 2, and No. 5 are natural gas-fired conveyor dryers. Proctor No. 4 is a steam-heated conveyor dryer. CPM Wolverine Proctor impingement dryer is a natural gas-fired belt type dryer.

[11/3/2016]

4.2 Emission Control Description

Emissions from the dryers are uncontrolled.

Emission Limits

4.3 Emission Limits

The total PM₁₀ emissions from the dryers shall not exceed 49.25 pounds per calendar day for all dryers combined.

[11/3/2016]

Operating Requirements

4.4 Production Limit

The total maximum production rate of all dryers combined shall not exceed 88,728 pounds per calendar day of output, as total finished product.

[11/3/2016]

4.5 Fuel Type

Proctors No. 1, No. 2, No. 5 and CPM Wolverine Proctor impingement dryer shall only burn natural gas.

[11/3/2016]

4.6 Dryers Stack Parameters

4.6.1 Each stack of Proctors No. 1, No. 2, No. 4, and No. 5 dryers shall meet the following specifications:

- Vertical, uncapped release
- Minimum height of 35 feet

[5/8/07]

4.6.2 Each of the three stacks of the CPM Wolverine Proctor impingement dryer shall meet the following specifications:

- Vertical, uncapped release
- Minimum height of 80 feet

[11/3/2016]

Monitoring and Recordkeeping Requirements

4.7 Production Monitoring

The permittee shall monitor and record the daily output, each calendar day, as total finished product, in pounds, of all dryers combined. A compilation of the most recent five years of monitoring data shall be maintained on-site and made available to DEQ representatives upon request.

[5/8/07]

5. REAL LINES NO. 1, NO. 2, NO. 3, AND NO. 4

5.1 Process Description

Two Vaculifts and two baghouse pneumatically transfer flakers from two flake bins to Real Lines. The flakes from Real Lines are pneumatically transferred through one of four fluidized bed dryers. A cyclone is associated with each of the four natural gas-fired dryers.

[5/8/07]

5.2 Emissions Control Description

Emissions from the dryer cyclones are uncontrolled.

Emissions Limits

5.3 Dryers No. 1 - No. 4 Combined Emissions Limits

The PM₁₀ emissions from Dryers No. 1, No. 2, No. 3, and No. 4 shall not exceed 72 pounds per calendar day for all dryers combined.

[5/8/07]

Operating Requirements

5.4 Combined Production Limits

The maximum production rate of Dryers No. 1, No. 2, No. 3, and No. 4 combined shall not exceed 271,536 pounds per calendar day of output as total finished product.

[5/8/07]

5.5 Fuel Type

Dryers No. 1, No. 2, No. 3, and No. 4 shall only combust natural gas.

[5/8/07]

Monitoring and Recordkeeping Requirements

5.6 Production Monitoring

The permittee shall monitor and record the daily output, each calendar day, as total finished product, of all dryers combined. A compilation of the most recent five years of monitoring data shall be maintained on-site and made available to DEQ representatives upon request.

[5/8/07]

6. PNEUMATIC CONVEYING EQUIPMENT AND PACKAGING AREA

6.1 Process Description

Two Vaculifts (Vaculift is a brand name of cyclone) and two baghouses pneumatically transfer flakers from two flake bins to Real Lines.

The packaging department receives potato products. Baghouses are in place to reduce dust emissions from packaging.

[6/30/10]

6.2 Emissions Control Description

Table 6.1 PNEUMATIC CONVEYING EQUIPMENT DESCRIPTION

Emissions Unit(s) / Process(es)	Emissions Control Device
Real Line Vaculift 1 and 2	None
Real Line 3	Baghouse
Real Line 4	Baghouse
Bagroom Dust Vaculift	None
A Small Flake Crusher Vaculift	None
Flaker Bagger Vaculift	Flaker Bagger Baghouse
Mixing Room	Baghouse No. 6
Packaging	Packaging Baghouse

[6/30/10]

Operating Requirements

6.3 Requirement to Use Baghouses

The permittee shall install and operate baghouses/cartridge filter system to control PM and PM₁₀ emissions from Real Lines 3 and 4, mixing room, and packaging.

[6/30/10]

7. FLAKER LINES NO. 1 AND NO. 2

7.1 Emissions Control Description

Flaker Line No. 1 and No. 2, each consists of three drum dryers. The emissions from the Flaker Line drum dryers are uncontrolled. The particulate emissions from the sniffer vents of Flaker Lines are controlled by cyclones. The particulate emissions from the Flaker Line bins are controlled by using cyclones and baghouses in series.

[11/3/2016]

Emissions Limits

7.2 Flaker Lines No. 1 and No. 2 Combined Emissions Limits

The PM₁₀ emissions from Flaker Lines No. 1 and No. 2 shall not exceed 130.8 pounds per calendar day for all dryers combined.

[11/3/2016]

Operating Requirements

7.3 Flaker Line No. 1 and No. 2 Production Limits

The maximum production rate of Flaker Line No. 1 and Flaker Line No. 2 combined (six drum dryers) shall not exceed 231,360 pounds per calendar day of output, as finished product.

[11/3/2016]

7.4 Requirement to use Baghouses for Flaker Line 1 and Line 2 Bins

Baghouses shall be used to control PM and PM₁₀ emissions from Flaker Line No. 1 and Flaker Line No. 2 bins.

[5/8/07]

7.5 Flaker Stack Parameters

The flaker stacks shall be at least 30 feet high.

[5/8/07]

7.6 Requirement to Use Cyclones for Flaker Lines Sniffer Vents

For Flaker Lines No. 1 and No. 2, the permittee shall install one cyclone to each Flaker Line to control particulate emissions from the sniffer vents of each Flaker Line.

[11/3/2016]

Monitoring Requirements

7.7 Production Rate Monitoring

The permittee shall monitor and record the daily production rate, each calendar day, as pounds of finished product, of Flaker Line No. 1 and Flaker Line No. 2. A compilation of the most recent five years of monitoring data shall be maintained on-site and made available to DEQ representatives upon request.

[5/8/07]

8. GENERAL REQUIREMENTS

8.1 Baghouse Operations and Maintenance (O&M) Manual Requirements

Through a prior permit requirement, the permittee shall have developed an O&M manual for the baghouses, which control the PM and PM₁₀ emissions from the plant. The O&M manual shall describe the procedures that will be followed to comply with General Provision 2 and the manufacturer specifications for the baghouse. The manual shall contain, at a minimum, requirements for monthly inspections of the baghouse during each month of operation. The inspections shall include but not be limited to checking the bags for structural integrity and that they are appropriately secured in place. The manual shall remain on site at all times and shall be made available to DEQ representatives upon request.

[5/8/07]

8.2 For the packaging baghouse, within 60 days of initial start-up, the permittee shall have developed a Baghouse/Filter System Procedures document for the inspection and operation of the baghouses/filter system which controls emissions from the packaging area. The Baghouse/Filter System Procedures document shall be a permittee developed document independent of the manufacturer supplied operating manual but may include summaries of procedures included in the manufacturer supplied operating manual.

The Baghouse/Filter System Procedures document shall describe the procedures that will be followed to comply with General Provision 2 and shall contain requirements for monthly see-no-see visible emissions inspections of the baghouse. The inspection shall occur during daylight hours and under normal operating conditions.

The Baghouse/Filter System Procedures document shall also include a schedule and procedures for corrective action that will be taken if visible emissions are present from the baghouse at anytime. At a minimum the document shall include:

- Procedures to determine if bags or cartridges are ruptured; and
- Procedures to determine if bags or cartridges are not appropriately secured in place.

The permittee shall maintain records of the results of each baghouse/filter system inspections in accordance with General Provision 10. The records shall include a description of whether visible emissions were present and if visible emissions were present a description of the corrective action that was taken.

The Baghouse/Filter System Procedures document shall be submitted to DEQ within 60 days of permit issuance, and shall contain a certification by a responsible official. Any changes to the Baghouse/Filter System Procedures document shall be submitted within 15 days of the change.

The Baghouse/Filter System Procedures document shall also remain on site at all times and shall be made available to DEQ representatives upon request.

The operating and monitoring requirements specified in the Baghouse/Filter System Procedures document are incorporated by reference to this permit and are enforceable permit conditions.

The permittee shall follow the baghouse procedures when it is developed.

[6/30/10]

9. 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, 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:
 - Enter upon the permittee’s premises where an emissions source is located, emissions-related activity is conducted, or where records are kept under conditions of this permit;
 - Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
 - Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - 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. This permit shall expire if construction has not begun within two years of its issue date, or if construction is suspended for one year.

[IDAPA 58.01.01.211.02, 5/1/94]

6. The permittee shall furnish DEQ written notifications as follows:
 - A notification of the date of initiation of construction, within five working days after occurrence; except in the case where pre-permit construction approval has been granted then notification shall be made within five working days after occurrence or within five working days after permit issuance whichever is later;
 - A notification of the date of any suspension of construction, if such suspension lasts for one year or more;
 - 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; and

- A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
- A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211.03, 5/1/94]

Performance Testing

7. 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.
8. 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.
9. Within 30 days, or up to 60 days when requested 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

10. The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Monitoring records 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, 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]

Excess Emissions

11. The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130–136 for excess emissions due to start-up, shut-down, scheduled maintenance, safety measures, upsets, and breakdowns.

[IDAPA 58.01.01.130–136, 4/5/00]

Certification

12. 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

13. 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

14. 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

15. 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

16. 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.

[IDAPA 58.01.01.211, 5/1/94]