



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

Brad Little, Governor
John Tippetts, Director

August 3, 2020

Dave Robinson, Director of Process Improvement
LinkOne Potato Solutions - Burley
2601 Washington Street
Burley, ID 83318

RE: Facility ID No. 031-00048, LinkOne Potato Solutions - Burley, Burley
Final Permit Letter

Dear Mr. Robinson:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2019.0030 PROJ 62435 to LinkOne Potato Solutions - Burley located at Burley for increasing the production limits. 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 April 23, 2020.

This permit is effective immediately and replaces PTC No. P-2019.0030 issued on January 14, 2020. This permit does not release LinkOne Potato Solutions - Burley 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 Twin Falls Regional Office, 650 Addison Avenue West, Suite 110, Twin Falls, ID 83301, Fax (208) 736-2194.

In order to fully understand the compliance requirements of this permit, as requested, Bobby Dye, Regional Manager - Air Quality and Remediation Manager, at (208) 736-2190, will schedule a permit handoff meeting to review and discuss the terms and conditions of this permit. Please note that this meeting should be scheduled once the permitted emissions units are operating and some representative records required by the permit have been generated by the facility. 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 cursive script that reads "Mike Simon".

Mike Simon
Stationary Source Bureau Chief
Air Quality Division

MS\syc
Permit No. Permit No. P-2019.0030 PROJ 62435
Enclosures

Air Quality

PERMIT TO CONSTRUCT

Permittee LinkOne Potato Solutions - Burley
Permit Number P-2019.0030
Project ID 62435
Facility ID 031-00048
Facility Location 2601 Washington Avenue
Burley, Idaho 83318

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 August 3, 2020



Shawnee Chen, PE, Permit Writer



Mike Simon, Stationary Source Manager

Contents

1	Permit Scope.....	3
2	Vegetable Dehydration Plant.....	5
3	General Provisions.....	8

1 Permit Scope

Purpose

1.1 This is a modified permit to construct (PTC) to increase the dryers' throughput and the scrubber stack's emissions limits.

[08/03/2020]

1.2 Those permit conditions that have been modified or revised by this permitting action are identified by the permit issue date citation located directly under the permit condition and on the right-hand margin.

1.3 This PTC replaces Permit to Construct No. P-2019.0030 issued on January 14, 2020.

[08/03/2020]

Regulated Sources

Table 1.1 lists all sources of regulated emissions in this permit.

Table 1.1 Regulated Sources

Permit Section	Sources		Control Equipment
2	<p><u>Drum Dryer (D101):</u> Manufacturer: HEIL Model: 105 Date of construction: 1/20/2013 Heat input rating: 8.7 MMBtu/hr Max. production: 60 T/day 8% moisture content final finished product Fuel: natural gas Permitted throughput: 41.4 tons/hr</p>	<p><u>Product Recovery Cyclone^(a):</u> Manufacturer: Fisher-Klosterman Model: XQ240-30M Type: single cyclone Date of installation: 1/20/2013</p>	<p><u>Odor Scrubber (also called packed tower scrubber, C001):</u> Manufacturer: Anguil Model: SPT-132-156 Type: packed tower scrubber Date of installation: 11/15/2016 VOC control efficiency: 95%</p>
	<p><u>Fluidized Bed Dryer (D102, also called fluid bed dryer):</u> Manufacturer: Carrier Model: QADII-3680S Date of construction: 01/15/2011 Date of modification: 01/10/2018 Heat input rating: 5.1 MMBtu/hr Max. production: 60 T/day 8% moisture content final finished product Fuel: natural gas Permitted throughput: 3.29 tons/hr</p>	<p><u>Product Recovery Cyclone^(a):</u> Manufacturer: Mac-Schenck Model: H60 Type: single cyclone Date of installation: 01/15/2011</p>	
	<p><u>Air Make-up Units (AMUS):</u> Manufacturer: Aerovent Model: G44C35 Date of Construction: 01/01/2012 Heat input rating: 3.5 MMBtu/hr Fuel: natural gas</p>		
	<p><u>Final Milling & Packaging (P200):</u> Manufacturer: Prater-Sterling Model: G-8-HFS Date of construction: 11/01/2016 Max. production: 60 T/day 8% moisture content final finished product</p>	<p><u>Product Recovery Cyclone^(a):</u> Manufacturer: Murphy-Rogers Model: MRG Type: single cyclone Date of installation: 11/01/2016</p> <p>Followed by</p> <p><u>Two Bag Filters (C002)^(a):</u> Manufacturer: Murphy-Rogers Model: 6A2, modified for dual bags Date of installation: 11/01/2016 PM₁₀ control efficiency: 99.9% or 0.01 gr/scf</p>	<p>None (exhaust inside building and emissions vented through three passive (unpowered) ceiling exhaust vents)</p>

a) It is process equipment according to EPA's policy.

[08/03/2020]

2 Vegetable Dehydration Plant

2.1 Process Description

LinkOne Potato Solutions - Burley facility receives vegetable byproducts (potato) as raw material. The facility dehydrates the raw material through a drum dryer and a fluid bed dryer (also called fluidized bed dryer) to customer specifications. Final product is packaged and shipped to customers.

Major equipment associated with air emissions at the facility includes one natural gas-fired drum dryer (8.7 MMBtu/hr), one natural gas-fired finishing dryer (fluidized bed dryer, 5.1 MMBtu/hr), and final product sizing and packaging with cyclone and fabric filter system. The plant operation is also supported by a natural gas-fired air makeup unit (3.5 MMBtu/hr). While dryer cyclones and the cyclone and bag filters for milling and packaging reduce particulate emissions, their main function is to recover products.

2.2 Control Device Descriptions

Emissions from the dryer cyclones are combined and controlled by a packed tower scrubber.

Refer to Table 1.1 for information on emissions units and their controls.

Emission Limits

2.3 Emission Limits

The emissions from the scrubber stack and building vents shall not exceed any corresponding emissions rate limits listed in Table 2.1.

Table 2.1 Vegetable Dehydration Plant Emission Limits ^(a)

Source Description	PM _{2.5} /PM ₁₀ ^(b)		NO _x	
	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)
Vegetable Dryers Packed Tower Scrubber Stack	1.513	6.63	1.73	7.58
Milling/Packaging Area Building Vent 01	0.0397	0.174	---	---
Milling/Packaging Area Building Vent 02	0.0177	0.077	---	---
Milling/Packaging Area Building Vent 03	0.0177	0.077	---	---

- In absence of any other credible evidence, compliance is ensured by complying with permit operating, monitoring, and record keeping requirements.
- Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers/2.5 micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.
- Pounds per hour, as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference test method, continuous emission monitoring system (CEMS) data, or DEQ-approved alternative.
- Tons per any consecutive 12-calendar month period.

[08/03/2020]

2.4 Opacity Limit

Emissions from the packed tower scrubber stack, or any other stack, vent, or functionally equivalent opening associated with the vegetable dehydration plant, 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.

Operating Requirements

2.5 Odor

According to IDAPA 58.01.01.775–776, 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.

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 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.

2.6 Dryers Throughput Limit

- The total input of vegetable material to the drum dryer shall not exceed 41.4 tons/hr, based on 24-hr average.
- The total input of vegetable material to the fluidized bed dryer shall not exceed 3.29 tons/hr, based on 24-hr average.

[08/03/2020]

2.7 Dryers Emissions Control

- 2.7.1 The permittee shall operate a product recovery cyclone to control particulate emissions from the drum dryer and a product recovery cyclone to control particulate emissions from the fluidized bed dryer.
- 2.7.2 The permittee shall install and operate a packed tower scrubber to control odor, VOCs, and particulate emissions from the drum dryer and fluidized bed dryer cyclones. Table 2.2 lists the packed tower scrubber design parameters that shall be maintained.

Table 2.2 Packed Tower Scrubber Design Parameters

Design Parameter	Specification
Type of Packing	polypropelene spherical type packing material
Packing Volume	1,235 cubic feet $(1/4 * \pi (11 \text{ ft})^2 * 13 \text{ ft})$
Packing Depth	13 feet

- 2.7.3 Each scrubber's operating parameter shall be equal to or greater than the respective values specified in the following:
- The pressure drop across the scrubber shall be equal to or greater than 1.0 inch of water.
 - The scrubbing liquid recycle flow rate (recirculation rate) at nozzle pressure (approximately 10 psig) shall be equal to or greater than 520 gallons per minute.
 - The scrubbing media pH shall be equal to or greater than 6.3.
- 2.7.4 The permittee shall operate the following monitoring devices:
- A device for the continuous measurement of the pressure drop across the scrubber in inches of water.
 - A device for the continuous measurement of the scrubbing liquid recycle flow rate to the wet scrubber in gallons per minute.
 - A device for the periodic measurement of the scrubbing liquid pH after exiting the scrubber.

- The monitoring devices shall be calibrated according to the manufacturer specified frequency and methods. Manufacturer specifications for calibration shall be maintained on-site and shall be made available to DEQ representatives upon request.

2.8 Emissions Control for Final Milling and Packaging

The permittee shall operate a product recovery cyclone and two bag filters in series to control particulate emissions from the final milling and packaging process. The emissions of the bag filters shall be exhausted inside the building.

Emissions concentration of each filter shall be 0.01 grain per cubic feet (gr/dscf) or less for particulate matter less than or equal to 10 micrometers. The permittee shall operate the bag filters according to manufacturer's recommendations.

Monitoring and Recordkeeping Requirements

2.9 Drum Dryer Throughput Monitoring

- The permittee shall monitor and record, on a daily basis, the calendar date, the total input of vegetable material to the drum dryer, in tons per day and divide it by 24 hr/day to demonstrate compliance with Dryers Throughput Limit permit condition.
- The permittee shall monitor and record, on a daily basis, the calendar date, the total input of vegetable material to the fluidized bed dryer, in tons per day and divide it by 24 hr/day to demonstrate compliance with Dryers Throughput Limit permit condition.

2.10 Dryers Scrubber Operating Parameters Monitoring

The permittee shall:

- Monitor and record the pressure loss of the gas stream through the scrubber in inches of water once each week.
- Monitor and record the scrubbing liquid recycle flow rate in gallons per minute once each week.
- Monitor and record the scrubbing liquid pH at the outlet of the scrubber once each day.

The permittee shall maintain records of the results of all monitoring, including equipment calibration records, in accordance with the General Provisions of this permit.

2.11 Recordkeeping for Bag Filters

The permittee shall keep manufacture documentation on-site indicating that emissions concentration of each filter is 0.01 gr/dscf or less for particulate matter less than or equal to 10 micrometers.

3 General Provisions

General Compliance

- 3.1 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.]
- 3.2 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, 5/1/1994]
- 3.3 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, 5/1/1994]

Inspection and Entry

- 3.4 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

- 3.5 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]
- 3.6 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; and

- A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211.01, 5/1/1994]

- 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.

[IDAPA 58.01.01.211.03, 5/1/1994]

Performance Testing

3.7 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.

3.8 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.

3.9 Within 60 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 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 and 4/11/2015]

Monitoring and Recordkeeping

3.10 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, 5/1/1994]

Excess Emissions

- 3.11** 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, 4/5/2000]

Certification

- 3.12** 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, 5/1/1994]

False Statements

- 3.13** 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, 3/23/1998]

Tampering

- 3.14** 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, 3/23/1998]

Transferability

- 3.15** This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

[IDAPA 58.01.01.209.06, 4/11/2006]

Severability

- 3.16** 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, 5/1/1994]