



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
C. Stephen Allred, Director

March 22, 2004

Certified Mail No. 7099 3220 0009 1975 04403

Bruce Wright, Senior Environmental Manager
Basic American Foods, Inc.
415 W. Collins Road
Blackfoot, ID 83221

RE: Facility ID No. 011-00012, Basic American Foods, Blackfoot, ID
Final Permit Letter

Dear Mr. Wright:

The Idaho Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) Number P-040300, which modifies PTC No. 011-00012 issued April 13, 1995, for the Blackfoot facility's process steam boilers in accordance with IDAPA 58.01.01.200 through 228 (*Rules for the Control of Air Pollution in Idaho*). This permit is effective immediately and is based on your permit application received on January 5, 2004.

This permit does not release Basic American Foods from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

A representative of the Pocatello Regional Office will contact you regarding a meeting with DEQ to discuss the permit terms and requirements. DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations 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 call Mike Simon at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,



Martin Bauer, Administrator
Air Quality Division

MB/KH/sd

Permit No. P-040300

Enclosures

c: Tiffany Floyd, Pocatello Regional Office
Stephen J. Nelson
Laurie Kral, EPA Region 10

cc: Sherry Davis, Air Quality Division
Ken Hanna, Permit Writer
Mike Simon, Permit Coordinator
Marilyn Seymore, Air Quality Division
Pat Rayne, AFS
Permit Binder
Phyllis Heitman (Ltr Only)
Reading File (Ltr Only)

Stephen J. Nelson
Manager
Coal Creek Environmental Associates
4621 118th Ave. SE
Bellevue, WA 98006



**Air Quality
PERMIT TO CONSTRUCT**

State of Idaho
Department of Environmental Quality

PERMIT NO.: P-040300
FACILITY ID NO.: 011-00012
AQCR: 61 **CLASS:** A
SIC: 2034 **ZONE:** 12
UTM COORDINATE (km): 387.7, 4784.0

1. PERMITTEE

Basic American Foods (BAF)

2. PROJECT

Process Steam Boilers

3. MAILING ADDRESS

415 West Collins

CITY

Blackfoot

STATE

ID

ZIP

83221

4. FACILITY CONTACT

Deloris Aguilar

TITLE

Plant Environmental Superintendent

TELEPHONE

(208) 785-8306

5. RESPONSIBLE OFFICIAL

Todd Peretti

TITLE

Plant Manager

TELEPHONE

(208) 785-8306

6. EXACT PLANT LOCATION

One Mile West of Blackfoot on Highway 26

COUNTY

Bingham

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Processed Vegetable Products – Dehydrated

8. GENERAL CONDITIONS

This permit is issued according to IDAPA 58.01.01.200, *Rules for the Control of Air Pollution in Idaho*, and 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.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) 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; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the Department of Environmental Quality 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.

This permit is not transferable to another person, place, or piece or set of equipment. This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented with its application. Changes of design or equipment may require DEQ approval pursuant to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.200, et seq.

C. STEPHEN ALLRED, DIRECTOR
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: March 22, 2004

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Acronyms, Units, and Chemical Nomenclature

AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
Btu	British thermal unit
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
gr	grain (1 lb = 7,000 grains)
HAPs	hazardous air pollutants
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
m	meter(s)
MMBtu	million British thermal units
MMBtu/hr	million British thermal units per hour
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD	prevention of significant deterioration
PTC	permit to construct
<i>Rules</i>	<i>Rules for the Control of Air Pollution in Idaho</i>
scf	standard cubic feet
SIC	Standard Industrial Classification
SO ₂	sulfur dioxide
T/yr	tons per year
µg/m ³	micrograms per cubic meter
UTM	Universal Transverse Mercator
VOC	volatile organic compound

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-040300

Permittee: Basic American Foods	Facility ID No.: 011-00012	Date Issued March 22, 2004
Location: Blackfoot		

1. PERMIT TO CONSTRUCT SCOPE

Purpose

1.1 This Permit to Construct (PTC) modifies PTC No. 011-00012 issued on November 4, 1994 and amended on April 13, 1995. The PTC's issued on November 4, 1994 and amended on April 13, 1995 are no longer effective as of the issuance date of this permit. The modification involves allowing the combustion of residual fuel oil and the increase in the annual combustion of distillate fuel oil for Boiler No. 8.

Regulated Sources

Table 1.1 lists all sources regulated in this PTC.

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Section	Source Description	Emissions Control(s)
2	Boiler No. 6: Manufacturer/Model: Johnson "509" Series, Model TF1800 - 3HG250S Rated Heat Input: 75 MMBtu/hr Steam Rate: 62,100 lb/hr Fuels: Natural gas and No. 2 Distillate fuel oil	Low NO _x Burner
2	Boiler No. 7: Manufacturer/Model: Springfield Model 52 Rated Heat Input: 39 MMBtu/hr Steam Rate: 30,000 lb/hr Fuels: Natural gas and No. 2 Distillate fuel oil	none
2	Boiler No. 8: Manufacturer/Model: Murray Rated Heat Input: 57 MMBtu/hr Steam Rate: 45,500 lb/hr Fuels: Natural gas, Distillate and Residual fuel oils.	none

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EMISSION LIMITS

2.1 Boiler No. 6, 7 and 8 Emission Limits

Emissions of particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM₁₀), particulate matter (PM), oxides of nitrogen (NO_x), carbon monoxide (CO), sulfur dioxide (SO₂) and volatile organic compounds (VOC) from the exhaust stacks of Boilers No. 6, 7 and 8 shall not exceed the values listed in Appendix A of this permit.

2.2 Boiler No. 6 Sulfur Dioxide Emissions - NSPS

When burning No. 2 diesel fuel, SO₂ emissions from the exhaust stack of Boiler No. 6 shall not exceed 0.50 pound per million BTU, as per 40 CFR 60.42c(d)(2).

2.3 Boiler No. 6 Visible Emissions - NSPS

Visible emissions from the exhaust stack of Boiler No. 6 shall not exceed 20% opacity (six-minute average), except for one six-minute period per hour of not more than 27% opacity, as per 40 CFR 60.43c(c). This opacity standard shall apply at all times, except during periods of start-up, shutdown or malfunction.

2.4 Boiler No. 6, 7 and 8 Visible Emissions

The permittee shall not discharge any air pollutant to the atmosphere from any boiler exhaust stack 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.

2.5 Boiler No. 8 Nickel Emissions

Emissions of nickel from the exhaust stack of Boiler No. 8 shall not exceed 140 pounds per year based on any consecutive 12-month period.

2.6 Fuel Burning Equipment - PM

The permittee shall not discharge to the atmosphere from any boiler PM in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas and 0.050 gr/dscf of effluent gas corrected to 3% oxygen by volume for liquid fuel in accordance with IDAPA 58.01.01.676-677.

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2. OPERATING REQUIREMENTS

3.1 Fuel Specifications – Boiler No. 6, 7 and 8

Boiler No. 6 and 7 shall burn natural gas fuel as primary fuel and low sulfur No. 2 distillate fuel oil as secondary fuel exclusively. Boiler No. 8 shall burn natural gas, distillate fuel oil, and residual fuel oil exclusively.

3.2 Fuel Specifications Boiler No. 6, 7 and 8

The sulfur content of fuels burned in the boilers shall not exceed the following amounts:

- No. 2 Distillate fuel oil burned in Boiler No. 6 and Boiler No.7 shall not exceed 0.05% sulfur by weight;
- No. 2 Distillate fuel oil burned in Boiler No. 8 shall not exceed 0.5% sulfur by weight in accordance with IDAPA 58.01.01.728, and;
- Residual fuel oil burned in Boiler No. 8 shall not exceed 1.5% sulfur by weight.

3.3 Annual Operating Schedule – Boiler No. 6, 7 and 8

Boiler No. 6 and Boiler No. 7 can operate for an annual maximum of 8,568 hours per boiler per year, based on any consecutive 12-month period. Boiler No. 8 can operate for an annual maximum of 8,760 hours per year.

3.4 Operation on Secondary Fuel – Boiler No. 6 and 7

Boiler No. 6 and Boiler No. 7 can each burn No. 2 diesel fuel for a maximum of 60 days per year or 1,440 hours per year.

3.5 Fuel Oil Throughput – Boiler No. 8

The combined quantity of distillate fuel oil and residual fuel oil burned in Boiler No. 8 shall not exceed 5450 gallons per day, based on a daily average, and 1,640,000 gallons per year, based on any consecutive 12-month period.

3.6 Stack Modification - Boiler No. 8

Prior to burning residual fuel oil or distillate fuel oil with more than 0.05% sulfur by weight in Boiler No. 8, the Permittee shall modify the Boiler No. 8 exhaust stack to have an exit diameter of no more than 42 inches and a height of no less than 100 feet above ground level.

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3. TESTING AND MONITORING REQUIREMENTS

4.1 Performance Test – Boiler No. 6

Per 40 CFR 60.44c(h), the SO₂ performance test for Boiler No. 6, when it burns No. 2 diesel fuel, shall consist of a certification from the owner or operator of the affected facility, and certification of the fuel supplier, as described under 40 CFR 60.48c(f)(1). Visible emissions shall be observed using methods specified in 40 CFR 60.45c(7) and IDAPA 58.01.01.625.

4.2 Sulfur Content Monitoring of No. 2 Diesel Fuel for Boiler No. 6

For Boiler No. 6, the permittee shall demonstrate continuous compliance with sulfur dioxide standards when burning No. 2 Diesel fuel by means of the fuel supplier certification of sulfur content, as described in 40 CFR 60.48c(f)(1).

4.3 Monitoring of Operating Parameters

The following operating data shall be monitored and recorded for each boiler on a daily basis:

4.3.1 Date;

4.3.2 Amount of steam generated per boiler;

4.3.3 Type of fuel and fuel consumption per boiler; and

4.3.4 The cumulative fuel consumption and cumulative number of hours of operation per boiler on natural gas fuel and on No. 2 diesel fuel.

4.4 Monitoring of Fuel Oil Throughput – Boiler No. 8

The permittee shall monitor and record the combined quantity of distillate fuel oil and residual fuel oil burned in Boiler No. 8 on a daily basis to demonstrate compliance with Permit Condition 3.5. The annual quantity of fuel oil burned shall be determined by monitoring and recording the combined quantity of distillate and residual fuel oil burned in Boiler No. 8 on a monthly basis, and then summing the monthly quantities over the previous consecutive 12-month period.

4.5 Fuel Sulfur Content – Fuel Receipts for Boiler No. 7 and 8

For each shipment of fuel oil received, the permittee shall obtain and maintain at the facility fuel receipts from the fuel supplier which demonstrate the oil received complies with the fuel sulfur content limits specified in Permit Condition 3.2.

4.6 Operating Data Records

Sulfur content certifications of No. 2 diesel fuel, and other operating data which are monitored per Section 4 of this permit, shall be recorded and maintained on-site for the two most recent years and shall be made available to DEQ's representatives upon request.

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4.7 PM Performance Test – Boiler No. 8

Within 60 days of achieving the maximum production rate of Boiler No. 8 when firing no. 6 fuel oil, but not later than 180 days after issuance of this permit, and at least once every five years thereafter, the permittee shall conduct a performance test to measure PM emissions from the stack of Boiler No. 8, when firing no. 6 fuel oil, to demonstrate compliance with the PM emission limit in Permit Condition 2.6. The test shall be conducted in accordance with the procedures outlined in 40 CFR 60, Appendix A, Method 5, or a DEQ-approved alternative. The initial performance test, and any subsequent performance tests conducted to demonstrate compliance, shall be performed in accordance with IDAPA 58.01.01.157 and the following requirements:

- Boiler No. 8 shall be operated at the worst case normal production rate during the performance test. A description of how this requirement was met shall be included in the performance test report.
- Visible emissions shall be observed during each performance test run using the methods specified in IDAPA 58.01.01.625.
- The quantity of steam produced during the test by Boiler No. 8 shall be recorded in pounds per hour during each performance test.

If the PM emission rate measured in the initial performance test is less than or equal to 75% of the emission standard in Permit Condition 2.6, the test shall be conducted again within five years of the test date. If the PM emission rate measured during the performance test is greater than 75%, but less than or equal to 90%, of the emission standard in Permit Condition 2.6, the test shall be conducted again within two years of the test date. If the PM emission rate measured during the performance test is greater than 90% of the emission standard in Permit Condition 2.6, the test shall be conducted again within one year of the test date.

4.8 Annual Boiler Tune-up - Boiler No. 6, 7, and 8

Within 180 days after issuance of this permit, and at least once per calendar year thereafter, the permittee shall tune and adjust the burners in each boiler to maintain efficient fuel combustion. The person conducting the tuning shall be qualified through training and experience to tune burners combusting natural gas and fuel oil.

The permittee shall maintain records of each boiler tuning conducted to comply with this Permit Condition. The records shall provide the date the tuning was conducted and a description of adjustments made to the burners to improve combustion efficiency. A description of the training and experience of the person conducting the tuning shall also be maintained.

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4. REPORTING REQUIREMENTS

5.1 Performance Test Reports

Each performance test report, including the required process data, shall be submitted to DEQ within 30 days of the date on which the performance test is conducted.

5.2 Sulfur Content Reports

The permittee shall keep records and submit quarterly reports to DEQ in accordance with 40 CFR 60.48c. The report shall include:

- 5.2.1 Records of fuel supplier certifications, which shall include the name of the fuel supplier, and a statement from the fuel supplier that the fuel supplied complies with the specifications under the definition of distillate oil in 40 CFR 60.41c; and
- 5.2.2 A certified statement signed by the owner or operator of the facility that the records of the fuel supplier certifications submitted represent all of the fuel combusted during that quarter.

5.3 Notification for Boiler 8 Stack Modification

Prior to burning residual fuel oil, or No. 2 fuel oil with more than 0.05% sulfur by weight, in Boiler No. 8, the Permittee shall submit a notification to DEQ of the date the stack modifications were completed in accordance with Permit Condition 3.6.

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5. APPENDIX A

BASIC AMERICAN FOODS

Emission Limits^a - Hourly (lb/hr) and Annual^b (T/yr)

Source Description	PM		PM-10		SO ₂		NO _x		VOC		CO	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/hr
Boiler #6	1.1	1.5	0.55	0.75	3.7	2.8	4.0	12.8	0.40	1.3	5.1	21.7
Boiler #7	0.6	0.8	0.30	0.40	1.9	1.5	5.4	23.0	0.20	1.0	1.8	7.50
Boiler #8	2.61	9.4	2.25	8.1	56.9	210	12.5	51.4	0.30	1.3	2.0	6.30

- a As determined by a pollutant specific U.S. EPA reference method, or DEQ approved alternative, or as determined by DEQ's emission estimation methods used in this permit analysis.
- b As determined by multiplying the actual or allowable (if actual is not available) pound per hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

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6. PERMIT TO CONSTRUCT GENERAL PROVISIONS

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.
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.
3. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
 - To enter, at reasonable times, upon the premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
 - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack compliance testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.
4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
5. The permittee shall notify DEQ, in writing, of the required information for the following events within 5 working days after occurrence:
 - Initiation of Construction - Date
 - Completion/Cessation of Construction - Date
 - Actual Production Startup - Date
 - Initial Date of Achieving Maximum Production Rate - Production Rate and Date
6. The Director may require the permittee to develop a list of operation and maintenance procedures to be submitted to DEQ. Such list of procedures shall become a part of this permit by reference, and the permittee shall adhere to all of the operation and maintenance procedures contained therein.
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.

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

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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.

8. 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.
9. In accordance with IDAPA 58.01.01.123, 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.