



August 26, 2009

**VIA CERTIFIED MAIL**

Ed Conn, Plant Manager  
Basic American Foods  
415 W. Collins Rd.  
Blackfoot, ID 83221

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

Dear Mr. Conn:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2009.0042 to Basic American Foods for installation of a new finish dryer located at Blackfoot, 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 March 31, 2009. This permit is effective immediately. This permit does not release Basic American Foods from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

This permit to construct was processed in accordance with IDAPA 58.01.01.209.05.c. In accordance with IDAPA 58.01.01.209.05.c, you may request at any time that the PTC provisions be incorporated into the Tier I operating permit through an administrative amendment in accordance with IDAPA 58.01.01.381. In accordance with 40 CFR 70.7(d)(3)(iii), you may implement the changes authorized by the PTC immediately upon submittal of this request.

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 Pocatello Regional Office, 444 Hospital Way #300, Pocatello, ID 83201, Fax (208) 236-6168.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Rick Elkins, Air Quality Analyst, at (208) 236-5020 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.

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 Darrin Pampaian at (208) 373-0502 or [darrin.pampaian@deq.idaho.gov](mailto:darrin.pampaian@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". The signature is written in a cursive, flowing style with a large initial "M".

Mike Simon  
Stationary Source Program Manager  
Air Quality Division

MS\DRP\hp

Project No. P-2009.0042

Enclosure



**Air Quality  
PERMIT TO CONSTRUCT  
State of Idaho  
Department of Environmental Quality**

**PERMIT No.:** P-2009.0042  
**FACILITY ID No.:** 011-00012  
**AQCR:** 61      **CLASS:** A      **ZONE:** 12  
**SIC:** 2034      **NAICS:** 311423  
**UTM COORDINATE (km):** 387.7, 4784.0

**1. PERMITTEE**

Blackfoot Facility of Basic American Foods, a Division of Basic American, Inc.

**2. PROJECT**

Installing new finish dryer CTZ

**3. MAILING ADDRESS**

415 W. Collins Rd.

**CITY**

Blackfoot

**STATE**

ID

**ZIP**

83221

**4. FACILITY CONTACT**

John Kirkpatrick

**TITLE**

Environmental Manager

**TELEPHONE**

(208) 785-8572

**5. RESPONSIBLE OFFICIAL**

Ed Conn

**TITLE**

Plant Manager

**TELEPHONE**

(208) 785-8320

**6. EXACT PLANT LOCATION**

415 W. Collins Rd., Blackfoot ID

**COUNTY**

Bingham

**7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**

Dehydrated food products and animal feed

**8. PERMIT AUTHORITY**

This permit is issued according to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200 through 228, 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 (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.

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 in design, equipment or operations may be considered a modification. Modifications are subject to DEQ review in accordance with IDAPA 58.01.01.200 through 228 of the Rules for the Control of Air Pollution in Idaho.

DARRIN PAMPAIAN, P.E., PERMIT WRITER  
DEPARTMENT OF ENVIRONMENTAL QUALITY

MIKE SIMON, STATIONARY SOURCE PROGRAM MANAGER  
DEPARTMENT OF ENVIRONMENTAL QUALITY

**DATE MODIFIED/REVISED:**

**DATE ISSUED:**

August 26, 2009

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## Acronyms, Units, and Chemical Nomenclature

|                          |  |
|--------------------------|--|
| acfm                     | actual cubic feet per minute   |
| AFS                      | AIRS Facility Subsystem  |
| AIRS                     | Aerometric Information Retrieval System  |
| AQCR                     | Air Quality Control Region   |
| ASTM                     | American Society for Testing and Materials   |
| BACT                     | Best Available Control Technology  |
| BAF                      | Basic American Foods   |
| Btu                      | British thermal unit   |
| CAA                      | Clean Air Act  |
| CFR                      | Code of Federal Regulations  |
| CO                       | carbon monoxide  |
| DEQ                      | Department of Environmental Quality  |
| EPA                      | U.S. Environmental Protection Agency   |
| gpm                      | gallons per minute   |
| gr                       | grain (1 lb = 7,000 grains)  |
| HAP                      | hazardous air pollutant  |
| hp                       | horsepower   |
| IDAPA                    | a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act |
| lb/hr                    | pounds per hour  |
| m                        | meter(s)   |
| MACT                     | Maximum Achievable Control Technology  |
| $\mu\text{g}/\text{m}^3$ | micrograms per cubic meter   |
| MMBtu                    | million British thermal units  |
| NAICS                    | North American Industry Classification System  |
| NESHAP                   | National Emission Standards for Hazardous Air Pollutants   |
| $\text{NO}_2$            | nitrogen dioxide   |
| $\text{NO}_x$            | nitrogen oxides  |
| NSPS                     | New Source Performance Standards   |
| PM                       | particulate matter   |
| $\text{PM}_{10}$         | particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers                                       |
| ppm                      | parts per million  |
| PSD                      | Prevention of Significant Deterioration  |
| PTC                      | permit to construct  |
| PTE                      | potential to emit  |
| scf                      | standard cubic feet  |
| SIC                      | Standard Industrial Classification   |
| SIP                      | State Implementation Plan  |
| SM                       | synthetic minor  |
| $\text{SO}_2$            | sulfur dioxide   |
| $\text{SO}_x$            | sulfur oxides  |
| T/yr                     | tons per year  |
| TAP                      | toxic air pollutant  |
| UTM                      | Universal Transverse Mercator  |
| VOC                      | volatile organic compound  |

# 1. PERMIT TO CONSTRUCT SCOPE

## Purpose

1.1 The purpose of this Permit to Construct is to establish enforceable requirements for the facility's operations involving new natural gas-fired finish dryer CTZ in accordance with the *Rules for the Control of Air Pollution in Idaho*.

## Regulated Sources

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

**Table 1.1 SUMMARY OF REGULATED SOURCES**

| Permit Section | Source Description  | Emissions Control  |
|----------------|---|--|
| 2.             | <u>Finish Dryer CTZ</u><br>Manufacturer: Proctor and Schwartz<br>Model: Custom<br>Burner Model: Maxon Cyclomax Low NO <sub>x</sub><br>Manufacture date: 2009<br>Heat input rating: 5.75 MMBtu/hr<br>Maximum capacity: 2,800 lb/hr<br>Fuel: natural gas only | N/A<br>Exit height: 50 ft (15.24 m)<br>Exit diameter: 2.56 ft (0.78 m)<br>Exit flow rate: 17,477.63 acfm<br>Exit temperature: 142 °F |

## 2. NATURAL GAS-FIRED FINISH DRYER CTZ

### 2.1 Process Description

The Basic American Foods Blackfoot facility produces a variety of dehydrated food products for external customers and for internal use. Products include potato granules, formulated dehydrated food products, dehydrated whole and piece food products, and animal feed. Raw materials into the process are cooked potatoes, cooked foods, dehydrated foods, and additives, including sulfites. Finish dryer CTZ is used to produce dehydrated food products by direct heating using natural gas combustion.

### 2.2 Emissions Control Description

Table 2.1 NATURAL GAS-FIRED FINISH DRYER DESCRIPTION

| Emissions Unit/Process | Emissions Control Device | Emissions Point |
|------------------------|--------------------------|-----------------|
| Finish Dryer CTZ       | N/A                      | CTZ             |

### *Emissions Limits*

#### 2.3 Emissions Limits

The PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, CO, and VOC emissions from the stack of finish dryer CTZ shall not exceed any corresponding emissions rate limits listed in Table 2.2.

Table 2.2 NATURAL GAS-FIRED FINISH DRYER CTZ EMISSIONS LIMITS<sup>1</sup>

| Source Description | PM <sub>10</sub> |                   | SO <sub>2</sub> |                   | NO <sub>x</sub> |                   | CO    |                   | VOC   |                   |
|--------------------|------------------|-------------------|-----------------|-------------------|-----------------|-------------------|-------|-------------------|-------|-------------------|
|                    | lb/hr            | T/yr <sup>2</sup> | lb/hr           | T/yr <sup>2</sup> | lb/hr           | T/yr <sup>2</sup> | lb/hr | T/yr <sup>2</sup> | lb/hr | T/yr <sup>2</sup> |
| Finish Dryer CTZ   | 0.58             | 1.63              | 0.12            | 0.36              | 0.20            | 0.88              | 1.43  | 6.24              | 0.06  | 0.26              |

<sup>1</sup>. In absence of any other credible evidence, compliance is assured by complying with this permit's operating, monitoring and record keeping requirements.

<sup>2</sup>. Tons per consecutive 12-calendar month period.

#### 2.4 Opacity Limit

Emissions from the finish dryer stack, or any other stack, vent, or functionally equivalent opening associated with the finish dryer, 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 Allowable Fuel Types

The finish dryer shall only combust natural gas as fuel.

#### 2.6 Dehydrated Food Products Hourly Production Weight Rate Limit

The dehydrated food products production rate for the finish dryer shall not exceed 2,800 lb/hr.

#### 2.7 Dehydrated Food Products Annual Production Weight Rate Limit

The dehydrated food products production rate for the finish dryer shall not exceed 15,698,000 lb/yr in any consecutive 12-calendar months.

## ***Monitoring and Recordkeeping Requirements***

### **2.8 Dehydrated Food Products Hourly Production Weight Monitoring**

To demonstrate compliance with the dehydrated food products hourly production limit the permittee shall monitor and record dehydrated food products production for the finish dryer daily. Hourly production shall be determined by dividing total daily dehydrated food products production by the actual hours of operation for the day.

### **2.9 Dehydrated Food Products Annual Production Weight Monitoring**

To demonstrate compliance with the dehydrated food products annual production limit the permittee shall monitor and record dehydrated food products production for the finish dryer monthly and annually. Annual throughput shall be determined by summing total monthly dehydrated food products production over each previous consecutive 12-month period.

### **2.10 Recordkeeping**

The permittee shall comply with the recordkeeping requirements of General Provision 7.

### 3. 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;
  - 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]

### ***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.

[IDAPA 58.01.01.322.15.h, 5/1/94; 40 CFR 70.6(a)(5)]