



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

224 South Arthur • Pocatello, Idaho 83204-3202 • (208) 236-6160

September 6, 2001

Dirk Kempthorne, Governor  
C. Stephen Allred, Director

**CERTIFIED MAIL # 7099 3400 0016 2606 9938**

Mr. Chad Eberhard, Plant Manager  
Basic American Foods, Inc.  
434 South Emerson Avenue  
Shelley, Idaho 83274

RE: Basic American Foods, Inc., Shelley, Idaho  
(PTC Ownership Transfer, Project No. P-010302, PTC No. 011-00020)

Dear Mr. Eberhard:

The Idaho Department of Environmental Quality (DEQ) is issuing amended Permit to Construct (PTC) Number 011-00020 for Basic American Foods, Inc., (BAF) Shelley, Idaho, in accordance with IDAPA 58.01.01.200 through 223 (*Rules for the Control of Air Pollution in Idaho*). The PTC is effective immediately and is based on your permit request received on February 26, 2001.

The PTC does not release the permittee from compliance with all other applicable federal, state, local, or tribal laws, regulations, or ordinances.

You are strongly encouraged to attend a meeting with DEQ to discuss the PTC terms and requirements with which your facility must comply. Mr. Larry Sims of the Pocatello Regional Office will contact you regarding this meeting. DEQ strongly recommends that your facility's plant manager, your responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with PTC conditions attend the meeting.

You, as well as any other entity, may have the right to appeal this final agency action pursuant to the Idaho Department of Health and Welfare Rules, Title 5, Chapter 3, "Rules Governing Contested Case Proceedings and Declaratory Rulings," by filing a petition with the Hearings Coordinator, Department of Environmental Quality, 1410 N. Hilton, Boise, ID 38706-1255, within thirty-five (35) days of the date of this decision. However, DEQ encourages you to contact the Air Quality Permit Program to address any concerns you may have with the enclosed permit prior to filing a petition for a contested case.

If you have any questions regarding the terms or conditions of the enclosed permits, please contact Mr. Larry Sims at (208) 236-6160.

Sincerely,

Mark Dietrich  
Regional Administrator  
Pocatello Regional Office

MD/SO:bm      B011.6004      G:\AHW\STEVE O\BASICAMERICANFOODS\SHELLEY\PTC COVER LETTER.DOC

Enclosures

cc: Faye Weber, Air Quality Division  
Belinda McFarland, State Office of Technical Services  
L. Kral, EPA - Region 10  
Larry Sims, Pocatello Regional Office



**Air Pollution  
PERMIT TO CONSTRUCT**

State of Idaho  
Department of Environmental Quality

P-010302

**PERMIT NO.:** 011-00020

**AQCR:** 061

**CLASS:** A

**SIC:** 2034

**ZONE:** 12

**UTM COORDINATE (km):** 409.0, 4803.5

**1. PERMITTEE**

Basic American Foods, Incorporated

**2. PROJECT**

Ownership Transfer (Boilers No. 1, 3, and 4 and Flake Lines No. 2, 3, and 4)

**3. MAILING ADDRESS**

434 S. Emerson Avenue

**CITY**

Shelley

**STATE**

Idaho

**ZIP**

83274

**4. FACILITY CONTACT**

John Voiss

**TITLE**

Environmental Manager

**TELEPHONE**

(208) 357-3402

**5. RESPONSIBLE OFFICIAL**

Chad Eberhard

**TITLE**

Plant Manager

**TELEPHONE**

(208) 357-3402

**6. EXACT PLANT LOCATION**

434 S. Emerson Avenue, Shelley, Idaho 83274

**COUNTY**

Bingham

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

Potato Processing and Packaging

**8. GENERAL CONDITIONS**

This permit is issued according to the *Rules for the Control of Air Pollution in Idaho*, Section 58.01.01.200, and pertains only to emissions of air contaminants that are regulated by the state of Idaho and to the sources specifically allowed to be constructed 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; and (d) in no manner implies or suggests that the Idaho Department of Environmental Quality (Department) or its officers, agents, or employees, assumes 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 Department approval pursuant to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.200, et seq.

**DISCLAIMER:** This document may serve as a Preliminary Inspection Finding Form for use by Department personnel in communicating your compliance status upon inspection. It does not constitute a final determination of compliance status with the Idaho Code or any rules promulgated, permits issued, or consent or judicial orders entered into pursuant to the law. The Department reserves the right to supplement this document with additional compliance determinations, and amend, change, or otherwise modify any compliance determination stated in this document. This document in no way restricts the state of Idaho, Department of Environmental Quality from taking any action available under law to address past, present, or future violations of the laws administered by the agency.

**POCATELLO REGIONAL ADMINISTRATOR  
DEPARTMENT OF ENVIRONMENTAL QUALITY**

**DATE ISSUED:** September 10, 2001

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: 011-00020**

PERMITTEE: BASIC AMERICAN FOODS, INCORPORATED  
LOCATION: SHELLEY

DATE ISSUED: SEPT. 10, 2001

**SOURCE: Boilers No. 1, 3, and 4 and Flake Lines No. 2, 3, and 4**

1. EMISSION LIMITS

1.1 Emission Limits

Sulfur dioxide, oxides of nitrogen, carbon monoxide, volatile organic compounds, and particulate matter with an aerodynamic diameter less than or equal to a nominal ten micrometers emissions shall not exceed any corresponding emission limit listed in the permit appendix.

Emissions of PM<sub>10</sub> emanating from each stack of Boilers No. 1, 3 and 4 shall not exceed 0.015 grains per standard dry cubic foot corrected to three percent oxygen in the stack gas in accordance with IDAPA 58.01.01.676.

Emissions of PM<sub>10</sub> emanating from each stack of Flake Lines No. 2, 3 and 4 shall not exceed 0.2 grains per standard dry cubic foot in the stack gas in accordance with IDAPA 58.01.01.710.08(b).

1.2 Opacity Limit

Emissions from the stacks, vents, or other functionally equivalent openings of Boilers No. 1, 3, and 4 and Flake Lines No. 2,3, and 4 shall not exceed 20 percent 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.

2. OPERATING REQUIREMENTS

2.1 Natural Gas Combustion

The permittee shall combust natural gas exclusively in Boilers No. 1, 3, and 4.

2.2 Fuel Oil Combustion

The permittee shall render Boilers No. 1, 3, and 4 inoperable for fuel oil.

2.3 Throughput Limits

2.3.1 Flake Lines

The maximum hourly throughput for each flake line shall not exceed 5.5 tons per hour based on a daily average.

2.3.2 Boiler No. 4 Steaming Rate

The steaming rate shall be limited to 60,000 pounds steam per hour based on a 24-hour average.

3. MONITORING AND RECORDKEEPING REQUIREMENTS

3.1 Operating Parameters

The most recent two years' compilation of records shall be kept onsite and shall be available to the Department upon request.

3.1.1 Production Rate

The permittee shall monitor and record each day, the average hourly production rate for each flake line during the calendar year.

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3.1.2 Water Sprays

The permittee shall monitor and record operation of the water sprays in the exhaust ductwork weekly at a minimum.

3.1.3 Steam Production Monitoring

The permittee shall install, calibrate, and maintain a monitor to continuously monitor the steaming rate of Boiler No. 4. For this permit, the term "steaming rate" shall mean the amount of steam produced by the boiler (in pounds per hour) averaged over a day's time. This is calculated by summing the 24-hourly steam flow readings divided by 24.

The permittee shall determine and record the steaming rate daily during operation of Boiler No. 4.

4. REPORTING REQUIREMENTS

4.1 Certification of Documents

All documents submitted to the Department, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, 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.

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: 011-00020**

PERMITTEE: BASIC AMERICAN FOODS, INCORPORATED  
 LOCATION: SHELLEY

DATE ISSUED: SEPT. 10, 2001

**APPENDIX**

**APPENDIX**

**Basic American Foods, Incorporated**

**Emission Limits<sup>1</sup> - Hourly and Annual<sup>2</sup>**

Source Description	SO <sub>2</sub> <sup>3</sup>		NO <sub>x</sub> <sup>4</sup>		CO <sup>5</sup>		PM <sub>10</sub> <sup>6</sup>		VOC <sup>7</sup>	
	lb/hr <sup>8</sup>	T/yr <sup>9</sup>	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Boiler No. 1	0.02	0.09	3.87	16.95	3.25	14.24	0.29	1.29	0.21	0.92
Boiler No. 3	0.02	0.09	2.83	12.40	2.38	10.42	0.22	0.96	0.16	0.7
Boiler No. 4	0.04	0.19	7.07	30.97	5.94	26.00	0.54	2.37	0.39	1.71
Flake Line 2							1.65	6.23		
Flake Line 3							1.65	6.23		
Flake Line 4							1.65	6.23		
<b>Total Emissions</b>	<b>0.08</b>	<b>0.37</b>	<b>13.77</b>	<b>60.32</b>	<b>11.57</b>	<b>50.66</b>	<b>6.00</b>	<b>23.31</b>	<b>0.76</b>	<b>3.33</b>

<sup>1</sup> As determined by a pollutant-specific U.S. Environmental Protection Agency reference method or a Department-approved alternative, or as determined by Department emission estimation methods used in this permit analysis.

<sup>2</sup> 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, or by actual annual production rates.

<sup>3</sup>Sulfur dioxide

<sup>4</sup>Nitrogen oxides

<sup>5</sup>Carbon monoxide

<sup>6</sup>Particulate matter with an aerodynamic diameter of ten microns or less

<sup>7</sup>Volatile organic compounds

<sup>8</sup>Pounds per hour

<sup>9</sup>Tons per year

PERMITTEE: BASIC AMERICAN FOODS, INCORPORATED  
LOCATION: SHELLEY

DATE ISSUED: SEPT. 10, 2001

**GENERAL PROVISIONS****PERMIT TO CONSTRUCT GENERAL PROVISIONS**

- A. 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 emission 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.
- B. 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.
- C. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
1. To enter at reasonable times upon the premises where an emission source is located, or in which any records are required to be kept under the terms and conditions of this permit; and
  2. 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 emission testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.
- D. 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.
- E. The permittee shall notify the Department, in writing, of the required information for the following events within five working days after occurrence:
1. Initiation of Construction - Date
  2. Completion/Cessation of Construction - Date
  3. Actual Production Startup - Date
  4. Initial Achievement of Maximum Production Rate - Production Rate and Date
- F. If emission testing is specified, the permittee must schedule such testing within 60 days after achieving the maximum production rate, but not later than 180 days after initial startup. Such testing must strictly adhere to the procedures outlined in IDAPA 58.01.01.157 and shall not be conducted on weekends or state holidays without prior written Department approval. Testing procedures and specific time limitations may be modified by the Department by prior negotiation if conditions warrant adjustment. The Department shall be notified at least 15 days prior to the scheduled compliance test. Any records or data generated as a result of such compliance test shall be made available to the Department upon request.
- The maximum allowable operating rate shall be limited to 120 percent of the average operating rate attained during any performance test period, for which a test protocol has been granted prior approval by the Department, unless (1) the test demonstrates noncompliance, (2) a more restrictive operating limit is specified elsewhere in this permit, or (3) at such an operating rate, emissions would exceed any emission limit(s) set forth in this permit.
- G. 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.