TECHNICAL BASIS FOR TIER I OPERATING PERMIT

DATE: November 12, 2002

PERMIT WRITER: JR Fuentes, Harbi Elshafei

PERMIT COORDINATOR: Bill Rogers

SUBJECT: AIRS Facility No. 051-00017, Idaho Fresh Pak, Inc., Lewisville
Final Tier I Operating Permit

Permittee:	Idaho Fresh Pak, Inc.
Permit Number:	051-00017
Air Quality Control Region:	61
AIRS Facility Classification:	A
Standard Industrial Classification:	2031
Zone:	12
UTM Coordinates:	419.0, 4839.0
Facility Mailing Address:	P.O. Box 130, Lewisville, ID 83431
County:	Jefferson
Facility Contact Name and Title:	Todd Scott, Plant Engineer
Contact Name Phone Number:	208-754-4686
Responsible Official Name and Title:	Gene R. Christiansen, Director of Manufacturing & Engineering
Exact Plant Location:	529 North 3500 East, Lewisville, ID 83431
General Nature of Business & Kinds of Products:	Potato dehydrating

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ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
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	pounds per hour
MACT	Maximum Available Control Technology
MMBtu	million British thermal units
NESHAP	Nation Emission Standards for Hazardous Air Pollutants
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
PTE	potential to emit
SCC	Source Classification Code
scf	standard cubic feet
SIP	State Implementation Plan
SO_2	sulfur dioxide
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compounds

PUBLIC COMMENT/AFFECTED STATES/EPA REVIEW

As required by IDAPA 58.01.01.364 (*Rules for the Control of Air Pollution in Idaho*), the DEQ provided a 30-day public comment period for the Idaho Fresh Pak, Inc. draft Tier I operating permit. The public comment period ran from August 1 through September 4, 2002. A public hearing was held September 3, 2002.

IDAPA 58.01.01.008.01, defines *affected states* as: "All states: whose air quality may be affected by the emissions of the Tier I source and that are contiguous to Idaho; or that are within 50 miles of the Tier I source."

A review of the site location information included in the permit application indicates that the facility is located within 50 miles of a state border. Therefore, the state of Wyoming was provided an opportunity to comment on the draft Tier I operating permit.

The only party that provided comments during the comment period was Idaho Fresh Pak, Inc. Those comments and the DEQ's responses are provided in Appendix A of the proposed technical memorandum.

A proposed was developed and submitted to the EPA for their review as required by IDAPA 58.01.01.366. The proposed permit was changed as appropriate in response to the public comments. The EPA provided no written objection to the proposed permit.

1. *PURPOSE*

The purpose of this memorandum is to explain the legal and factual basis for this draft Tier I operating permit in accordance with IDAPA 58.01.01.362.

DEQ has reviewed the information provided by Idaho Fresh Pak, Inc. regarding the operation of their facility located in Lewisville, Idaho. This information was submitted based on the requirements to submit a Tier I operating permit in accordance with IDAPA 58.01.01.300.

2. *SUMMARY OF EVENTS*

On May 9, 1995 DEQ received a Tier I operating permit application from Idaho Fresh Pak, Inc. for their Lewisville, Idaho facility. Supplemental information was received on August 24 and December 8, 1995, May 6, 1996, and May 11, 2001. A draft Tier I permit was made available for public comment from August 1 through September 4, 2002. Idaho Fresh Pak, Inc. was the only party to provide comments. A proposed permit was submitted to EPA for their review on October 3, 2002. EPA provided no written objection.

3. *BASIS OF THE ANALYSIS*

The following documents were relied upon in preparing this memorandum and the Tier I operating permit:

- Tier I operating permit application, received May 9, 1995; and supplemental application materials received on August 24 and December 8, 1995, May 6, 1996, and May 11, 2001
- Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, January 1995, Office of Air Quality Planning and Standards, EPA
- Guidance developed by the EPA and DEQ
- Title V permits issued by other jurisdictions

4. *FACILITY DESCRIPTION*

4.1 GENERAL PROCESS DESCRIPTION

Idahoan's Lewisville facility produces a variety of dehydrated potato products via drying, dehydration, and material handling.

4.2 FACILITY CLASSIFICATION

The facility is a major facility as defined by IDAPA 58.01.01.008.10 because the facility emits or has the potential to emit a regulated air pollutant in amounts greater than or equal to 100 T/yr. The facility is not a designated facility as defined by IDAPA 58.01.011.006.27. The SIC defining the facility is 2031 and the AIRS facility classification is A.

4.3 AREA CLASSIFICATION

The facility is located in Jefferson County, which is located within AQCR 6. This area is unclassifiable or all regulated state and federal criteria air pollutants. There are no Class I areas within 10 km of the facility.

4.4 PERMITTING HISTORY

Idaho Fresh Pak, Inc. has not been issued any air quality permits.

4.5 EMISSIONS DESCRIPTION

The permittee has submitted the following maximum emissions:

Table 4.1 - MAXIMUM EMISSIONS

CO	NO_x	SO_2	PM_{10}	VOC
90.35	316.60	1298.23	76.7	8.1

The permittee determined the above emissions using facility-operating scenarios included in its Tier I operating permit application. The Erie City boiler No. 1, Erie City boiler No. 2, and Cleaver Brooks boiler No. 3 contributes the following emissions:

Table 4.2 - ERIE CITY BOILER NO. 1 EMISSIONS

CO	NO_x	SO_2	PM_{10}	VOC
20.1	81.9	360.38	7.44	1.81

Table 4.3 - ERIE CITY BOILER NO. 2 EMISSIONS

CO	NO_x	SO_2	PM_{10}	VOC
20.1	81.9	360.38	7.44	1.81

Table 4.4 - CLEAVER BROOKS BOILER NO. 3 EMISSIONS

CO	NO_x	SO_2	PM_{10}	VOC
30.46	129.36	569.19	11.76	2.75

5. REGULATORY ANALYSIS

5.1 FACILITY-WIDE APPLICABLE REQUIREMENTS

5.1.1 Fugitive Particulate Matter - IDAPA 58.01.01.650-651

5.1.1.1 Requirement

Permit Condition 1.1 states that all reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651.

5.1.1.2 Compliance Demonstration

Permit Condition 1.2 states that the permittee is required to monitor and maintain records of the frequency and the methods used by the facility to reasonably control fugitive particulate emissions. IDAPA 58.01.01.651 gives some examples of ways to reasonably control fugitive emissions (e.g., using water or chemicals, applying dust suppressants, using control equipment, covering trucks, paving roads or parking areas, and removing materials from streets).

Permit Condition 1.3 requires that the permittee maintain a record of all fugitive dust complaints received. In addition, the permittee is required to take appropriate corrective action as expeditiously as practicable after a valid complaint is received. The permittee is also required to maintain records that include the date that each complaint was received and a description of the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

To ensure that the methods being used by the permittee to reasonably control fugitive PM emissions whether or not a complaint is received, Permit Condition 1.4 requires that the permittee conduct periodic inspections of the facility. The permittee is required to inspect potential sources of fugitive emissions during daylight hours and under normal operating conditions. If the permittee determines that the fugitive emissions are not being reasonably controlled the permittee shall take corrective action as expeditiously as

practicable. The permittee is also required to maintain records of the results of each fugitive emissions inspection.

Permit Conditions 1.3 and 1.4 require the permittee to take corrective action as expeditiously as practicable. In general, DEQ believes that taking corrective action within 24 hours of receiving a valid complaint or determining that fugitive particulate emissions are not being reasonably controlled meets the intent of this requirement. However, it is understood that, depending on the circumstances, immediate action or a longer time period may be necessary.

5.1.2 Control of Odors - IDAPA 58.01.01.775-776

5.1.2.1 Requirement

Permit Condition 1.5 and IDAPA 58.01.01.776 both state: *"No person shall allow, suffer, cause or permit the emission of odorous gases, liquids or solids to the atmosphere in such quantities as to cause air pollution."* This condition is currently considered federally enforceable until such time it is removed from the SIP, at which time it will be a state-only enforceable requirement.

5.1.2.2 Compliance Demonstration

Permit Condition 1.6 requires the permittee to maintain records of all odor complaints received. If the complaint has merit, the permittee is required to take appropriate corrective action as expeditiously as practicable. The records are required to contain the date that each complaint was received and a description of the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

Permit Condition 1.6 requires the permittee to take corrective action as expeditiously as practicable. In general, DEQ believes that taking corrective action within 24 hours of receiving a valid odor complaint meets the intent of this requirement. However, it is understood that, depending on the circumstances, immediate action or a longer time period may be necessary.

5.1.3 Visible Emissions - IDAPA 58.01.01.625

5.1.3.1 Requirement

IDAPA 58.01.01.625 and Permit Condition 1.7 states: *"No person shall 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 IDAPA 58.01.01.625. This provision does not apply when the presence of uncombined water, NO_x, and/or chlorine gas is the only reason for the failure of the emissions to comply with the requirements of this rule.

IDAPA 58.01.01.625 applies to all emissions units at the facility.

5.1.3.2 Compliance Demonstration

To ensure reasonable compliance with Permit Condition 1.7, Permit Condition 1.8 requires that the permittee conduct routine visible emissions inspections of the facility. The permittee is required to inspect potential sources of visible emissions during daylight hours and under normal operating conditions. The visible emissions inspection consists of a see/no see evaluation for each potential source of visible emissions. If any visible emissions are present from any point of emissions covered by this section, the permittee must either take appropriate corrective action as expeditiously as practicable, or 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 determined to be greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee must take corrective action and report the exceedance in its annual compliance certification and in accordance with the excess emissions rules in IDAPA 58.01.01.130-136. The permittee is also required to maintain records of the results of each visible emissions inspection and each opacity test when conducted. These records must include the date of each inspection, a description of the permittee's assessment of the

conditions existing at the time visible emissions are present, any corrective action taken in response to the visible emissions, and the date corrective action was taken.

It should be noted that IDAPA 58.01.01.625 and Permit Condition 1.7 to the specific and insignificant emissions units are listed in the permit.

Permit Condition 1.8 requires the permittee to take corrective action as expeditiously as practicable. In general, DEQ believes that taking corrective action within 24 hours of discovering visible emissions meets the intent of this requirement. However, it is understood that, depending on the circumstances, immediate action or a longer time period may be necessary.

5.1.4 Excess Emissions - IDAPA58.01.01.130-136

5.1.4.1 Requirement

Permit Condition 1.9 requires that the permittee comply with the requirements of IDAPA 58.01.01.130-136 for startup, shutdown, scheduled maintenance, safety measures, upset, and breakdowns. This section is fairly self-explanatory and no additional detail is necessary in this technical analysis. It should; however, be noted that subsections 133.02, 133.03, 134.04, and 134.05 are not specifically included in the permit as applicable requirements. These provisions of the *Rules* only apply if the permittee anticipates requesting consideration under subsection 131.02 of the *Rules* to allow DEQ to determine if an enforcement action to impose penalties is warranted. Section 131.01 states "*. . . The owner or operator of a facility or emissions unit generating excess emissions shall comply with Sections 131, 132, 133.01, 134.01, 134.02, 134.03, 135, and 136, as applicable. If the owner or operator anticipates requesting consideration under Subsection 131.02, then the owner or operator shall also comply with the applicable provisions of Subsections 133.02, 133.03, 134.04, and 134.05.*" Failure to prepare or file procedures pursuant to sections 133.02 and 134.04 is not a violation of the *Rules* in and of itself, as stated in subsections 133.03.a and 134.06.b.

Therefore, since the permittee has the option to follow the procedures in subsections 133.02, 133.03, 134.04, and 134.05; and is not compelled to, the subsections are not considered applicable requirements for the purpose of this permit and are not included as such.

5.1.4.2 Compliance Demonstration

The compliance demonstration is contained within the text of Permit Condition 1.9.

5.1.5 Excess Emissions

Idaho Fresh Pak, Inc., Lewisville has not identified any circumstances for startup, shutdown, or maintenance that would create excess emissions. This permitting action does not include any review and incorporation of excess emissions plans in the permit. Excess emissions are defined by IDAPA 58.01.01.006.35.

IDAPA 58.01.01.130-136 addresses the applicable regulations for excess emissions procedures. Permit Condition 1.9 incorporates these requirements.

5.1.6 Reports and Certifications

See Permit Condition 1.10.

5.1.7 Monitoring & Recordkeeping Requirements

See Permit Condition 1.11.

5.1.8 Open Burning

IDAPA 58.01.01.600-616 present the rules governing the control of open burning. Permit Condition 1.12 incorporates these requirements. Idaho Fresh Pak, Inc., Lewisville has not identified any circumstances for

open burning. This permitting action does not include any review and incorporation of excess emissions plans in the permit.

5.1.9 Renovation/Demolition

See Permit Condition 1.13.

5.1.10 Regulated Substances for Accidental Release Prevention Provisions

See Permit Condition 1.14.

5.1.11 Test Methods

See Permit Condition 1.15.

5.1.12 Fuel-Burning Equipment

See Permit Condition 1.16.

5.1.13 Fuel-Sulfur Content

See Permit Condition 1.17. As submitted in application materials, permittee does not use fuel oil.

5.1.14 Compliance Testing

See Permit Condition 1.18.

5.1.15 Recycling and Emissions Reductions

See Permit Condition 1.19.

5.2 EMISSIONS UNIT SPECIFIC REQUIREMENTS

5.2.1 Group 1 - Boilers

5.2.1.1 Emissions Unit Description

The steam generating plant consists of three natural-gas/distillate-fuel fired boilers that supply steam to the potato dehydration plant.

- Erie City Boiler No. 1 was installed in 1964 and has a rated maximum steam capacity of 40,000 lbs/hr or 54.56 MMBtu/hr.
- Erie City Boiler No. 2 was installed in 1966 and has a rated maximum steam capacity of 40,000 lbs/hr or 54.56 MMBtu/hr.
- Cleaver-Brooks Boiler No. 3 was installed in 1968, was modified to burn distillate fuel oil in 2000, and has a rated maximum steam capacity of 60,000 lbs/hr or 82.80 MMBtu/hr. Therefore, boiler No. 3 is subject to 40 CFR 60, Subpart Dc.

Currently, the boilers have no control devices.

5.2.1.2 Permit Limits

Table 5.1 - PERMIT LIMITS

Emissions Units	Parameter	Permit Limit/ Standard Summary	Applicable Requirements Reference
Boiler No. 3	PM	0.050 gr/dscf at 3% O_2 for liquid burning equipment 0.015 gr/dscf at 3% O_2 for natural gas burning equipment	IDAPA 58.01.01.676
Boiler No. 1 & No. 2	PM	0.050 gr/dscf at 3% O_2 for liquid burning equipment 0.015 gr/dscf at 3% O_2 for natural gas burning equipment	IDAPA 58.01.01.677
Boilers No. 1, No. 2, No. 3	Opacity	20% for three minutes in any 60-minute period	IDAPA 58.01.01.625

The 20% opacity limit applies to these emissions units. As submitted in permittee's August 24, 1995 application, the permitted operating scenario given was for 8,760 hours per year.

5.2.1.3 Performance Testing

The permittee will perform compliance tests for PM emissions from boiler stacks No. 3, and No. 1 or No. 2. A test is required on boiler No. 1 or No. 2 because they are similar and should have similar emissions rates. The permittee will perform a PM compliance test utilizing EPA Reference Method 5, or a DEQ-approved alternative method(s).

The tests shall be conducted to demonstrate compliance with the distillate fuel oil grain-loading standard contained in Permit Condition 2.1, 2.2. During each compliance test, the permittee shall:

- Monitor and record the steam production rate of the respective boilers.
- Measure the distillate fuel feed rate.
- Conduct a visible emissions evaluation.
- Record and maintain information in accordance with Permit Condition 1.11.

If the particulate grain-loading measured in the initial performance test is less than or equal to 75% of the emissions standard in Permit Condition 2.1 and 2.2, no further testing shall be required during the term of the permit. If the particulate grain-loading measured during the initial performance test is greater than 75%, but less than or equal to 90% of the emissions standard in Permit Condition 2.1 and 2.2, a second test shall be required in the third year of the permit term. If the particulate grain-loading measured during the performance test is greater than 90% of the emissions standard in Permit Condition 2.1 and 2.2, the permittee shall conduct a performance test annually. At minimum, the permittee must conduct one PM compliance test during the five-year permit term.

5.2.1.4 Monitoring, Recordkeeping & Reporting Requirements

Opacity monitoring, recordkeeping, and reporting requirements for this emissions unit are handled per the Facility-wide requirements listed in Permit Section 1. Monitoring, recordkeeping, and reporting requirements for Permit Conditions 2.6.1 and 2.6.2 are necessary to assure compliance with Permit Conditions 2.5, 1.17.1, 1.17.2, and 1.17.3.

5.2.2 Group 2 – Dehydration Equipment

5.2.2.1 Emissions Unit Description

The dehydration units receive the potatoes after they are sorted, steam-peeled, cut, and blanched to remove surface moisture. The dryers are heated with natural gas-fired burners or steam from the boilers. The following nine dehydration units encompass potato dehydration:

- 92 Dryer 1 rated at 3.72 MMBtu/hr and fired on natural gas.
- 92 Dryer 2 rated at 3.6 MMBtu/hr and fired on natural gas.
- 92 Dryer 3 rated at 7 MMBtu/hr and fired on natural gas.
- Proctor 2 rated at 7 MMBtu/hr and fired on natural gas.
- Proctor 3 steam powered and rated at 550 lbs/hr maximum output.
- Proctor 4 steam powered and rated at 550 lbs/hr maximum output.
- Proctor 5 rated at 7.44 MMBtu/hr and fired on natural gas.
- Flaker Line 1 steam powered and rated at 2,440 lbs/hr maximum output.
- Flaker Line 2 steam powered and rated at 3,660 lbs/hr maximum output.

Currently, these dehydration units have no control devices.

IDAPA 58.01.01.676 and .677 grain-loading standards do not apply to these units because the combustion products and the particulate from material being dried exit at the same stack.

5.2.2.2 Permit Limits

Table 5.2 - PERMIT LIMITS

Parameter & Emissions Units	Permit Limit/Standard Summary	Applicable Requirements Reference
PM for Proctor 4 Process (installed in 1968)	$E=0.045\ (PW)^{0.60}$; $E=1.12\ (PW)^{0.27}$	IDAPA 58.01.01.702.01
PM for 92 Dryer 1, 92 Dryer 2, 92 Dryer 3, Proctor 2, Proctor 3, Proctor 5, Flaker Line 1, and Flaker Line 2 Processes (all units installed and/or modified after 1979)	$E=0.045\ (PW)^{0.60}$; $E=1.12\ (PW)^{0.25}$	IDAPA 58.01.01.701.01
Opacity for all Group 2 Emissions Units	No more than 20% for more than three minutes in any 60-minute period.	IDAPA 58.01.01.625

The 20% opacity limit applies to these emissions units. As submitted in permittee's August 24, 1995 application, the permitted operating scenario given was for 8,760 hours per year.

5.2.2.3 Performance Testing

The permittee will perform a compliance test on Flaker Line 2 for PM utilizing EPA Reference Method 5. The test shall be conducted to demonstrate compliance with Permit Condition 3.2. Flaker Line 2 was identified in the May 11, 2001 supplemental permit application submittal as having the highest throughput rates and PM emissions of any dehydration unit. Maximum throughput was identified to be 21,973 lbs/hr, and PM emissions were identified to be 18.75 T/yr.

The emissions factor developed from the PM test on Flaker Line 2 will be used to demonstrate compliance with Permit Conditions 3.1 and 3.2 for all other dehydration units.

The May 9, 1995, permit application and subsequent supplemental submittals contain material transfer or mass balance methods for determining regulated pollutant emissions factors; the supplied emissions factors are not sufficient for quantifying emissions for the dehydration units. Potato dehydration equipment is not subject to AP-42 emissions factors, and Idahoan has never source-tested their dehydration equipment to determine PM emissions. Therefore, a performance test is required in Permit Condition 3.5 on the worst-case scenario dehydration unit, which is Flaker Line 2. The compliance test is required to determine compliance with Permit Conditions 3.1, 3.2, and 3.3. During each compliance test, the permittee shall monitor and record the finished potato product throughput, conduct a visible emissions evaluation to determine compliance with Permit Condition 3.3, and record and maintain information in accordance with Permit Condition 1.11.

If the PM measured in the initial performance test is less than or equal to 75% of the Process Weight Rate standard in Permit Condition 3.1 and 3.2, no further testing shall be required during the term of the permit. If PM measured during the initial performance test is greater than 75%, but less than or equal to 90% of the emissions standard in Permit Condition 3.1 and 3.2, a second test shall be required in the third year of the permit term. If PM measured during the performance test is greater than 90% of the emissions standard in Permit Condition 3.1 and 3.2, the permittee shall conduct a performance test annually. At minimum, the permittee must conduct one PM compliance test during the five-year permit term.

5.2.2.4 Monitoring, Recordkeeping & Reporting Requirements

The permittee will perform monthly visible emissions monitoring as required in Permit Condition 3.4 to demonstrate compliance with the opacity limit. Monitoring, recordkeeping, and reporting requirements for Permit Condition 3.6 are necessary to assure compliance with Permit Conditions 3.1, 3.2; 3.3, and 3.5.

5.2.3 Group 3 – Vacu-Lifts

5.2.3.1 Emissions Unit Description

The Vacu-Lift units either move dehydrated product or separate dust from the product and are powered by electrical fans. The following Vacu-Lift units move product:

- Flake Bagger Vacu-Lift;
- 92 Line 1 Vacu-Lift;
- 92 Line 2 Vacu-Lift; and
- Crush Vacu-Lift.

The following Vacu-Lift units separate dust from the product:

- 92 Line 1 Stack Vacu-Lift;
- 92 Line 2 Stack Vacu-Lift;
- 92 Line 3 Stack Vacu-Lift; and
- Bag Room Dust Vacu-Lift that removes dust from the Bag Room.

5.2.3.2 Permit Limits

Table 5.3 - PERMIT LIMITS

Parameter & Emissions Units	Permit Limit/Standard Summary	Applicable Requirements Reference
PM for Crush Vacu-Lift (unit installed in 1968)	$E=0.045\ (PW)^{0.60}$; $E=1.12\ (PW)^{0.27}$	IDAPA 58.01.01.702.01
Flake Bagger Vacu-Lift, 92 Line 1 Vacu-Lift, 92 Line 2 Vacu-Lift (all units installed after 1979)	$E=0.045\ (PW)^{0.60}$; $E=1.12\ (PW)^{0.25}$	IDAPA 58.01.01.701.01
Opacity for all Group 3 Emissions Units	No more than 20% for more than three minutes in any 60-minute period	IDAPA 58.01.01.625;

The 20% opacity limit applies to these emissions units. As submitted in permittee's August 24, 1995 application, the permitted operating scenario given was for 8,768 hours per year.

5.2.3.3 Performance Testing

The permittee will perform a compliance test on the Crush Vacu-Lift for PM utilizing EPA Reference Method 5. The test shall be conducted to demonstrate compliance with Permit Conditions 4.1, 4.2, and 4.3. The Crush Vacu-Lift was identified in the May 11, 2001 supplemental permit application submittal as having the

highest throughput rates and PM emissions of any Vacu-Lift unit. Maximum throughput was identified to be 1,800 lbs/hr, and PM emissions were identified to be 7.84 T/yr.

The emissions factor developed from the PM test on the Crush Vacu-Lift will be used to demonstrate compliance with Permit Conditions 4.1 and 4.2 for all other dehydrated product separator units.

The May 9, 1995, permit application and subsequent supplemental submittals contain material transfer or mass balance methods for determining regulated pollutant emissions factors; the supplied emissions factors are not sufficient for quantifying emissions for the Vacu-Lift units. Idaho Fresh Pak, Inc. has never source-tested their Vacu-Lift equipment to quantify PM emissions. Therefore, a performance test is required in Permit Condition 4.5 on the worst-case scenario normal operating Vacu-Lift unit, which is the Crush Vacu-Lift. The compliance test is required to determine compliance with Permit Conditions 4.1, 4.2, and 4.3. During each compliance test, the permittee shall monitor and record the finished potato product throughput, conduct a visible emissions evaluation to determine compliance with Permit Condition 4.3, and record and maintain information in accordance with Permit Condition 1.11.

If the PM measured in the initial performance test is less than or equal to 75% of the Process Weight Rate standard in Permit Condition 4.1 and 4.2, no further testing shall be required during the term of the permit. If PM measured during the initial performance test is greater than 75%, but less than or equal to 90% of the emissions standard in Permit Condition 3.1 and 3.2, a second test shall be required in the third year of the permit term. If PM measured during the performance test is greater than 90% of the emissions standard in Permit Condition 4.1 and 4.2, the permittee shall conduct a performance test annually. At minimum, the permittee must conduct one PM compliance test during the five-year permit term.

5.2.3.4 Monitoring, Recordkeeping & Reporting Requirements

The permittee will perform monthly visible emissions monitoring as required in Permit Condition 4.4 to demonstrate compliance with the opacity limit. Monitoring, recordkeeping, and reporting requirements for Permit Condition 4.6 is necessary to assure compliance with Permit Conditions 4.1, 4.2, 4.3, and 4.5.

5.2.4 Group 4 – Baghouses

5.2.4.1 Emissions Unit Description

The Baghouse units either move dehydrated product to storage bins to be bagged or remove dust from the areas these units service. The following Baghouses move product:

- Flaker Line 1 Baghouse;
- Flaker Line 2 Baghouse;
- Flaker Bagger Baghouse; and
- 92 Line 3 Baghouse.

The following Baghouses remove dust from the areas they service:

- Packaging Baghouse No. 1;
- Packaging Baghouse No. 2;
- Packaging Baghouse No. 3;
- Packaging Baghouse No. 4;
- Packaging Baghouse No. 5; and
- Mixing Room Baghouse in Packaging.

5.2.4.2 Permit Limits

Table 5.4 - PERMIT LIMITS

Parameter & Emissions Units	Permit Limit/Standard Summary	Applicable Requirements Reference
Flaker Line 1 Baghouse, Flaker Line 2 Baghouse, Flaker Bagger Baghouse, 92 Line 3 Baghouse, Packaging Baghouse No. 1, Packaging Baghouse No. 2, Packaging Baghouse No. 3, Packaging Baghouse No. 4, Packaging Baghouse No. 5, Mixing Room Baghouse	$E=0.045\ (PW)^{0.60}$; $E=1.12\ (PW)^{0.25}$	IDAPA 58.01.01.701.01
Opacity for all Group 4 Emissions Units	No more than 20% for more than three minutes in any 60-minute period	IDAPA 58.01.01.625;

The 20% opacity limit applies to these emissions units. As submitted in permittee's August 24, 1995 application, the permitted operating scenario given was for 8,768 hours per year.

5.2.4.3 Monitoring, Recordkeeping & Reporting Requirements

The permittee will perform monthly visible emissions monitoring as required in Permit Condition 5.3 to demonstrate compliance with the opacity limit. Monitoring, recordkeeping, and reporting requirements for Permit Condition 5.5 are necessary to assure compliance with Permit Conditions 5.1, 5.2, and 5.3.

5.2.4.4 Developing an Operations & Maintenance Manual

Idaho Fresh Pak, Inc. must develop an Operations & Maintenance manual to demonstrate compliance with Permit Conditions 5.1. The manual must include all Group 4 baghouses.

6. *INSIGNIFICANT ACTIVITIES*

Listed below are the insignificant activities described by the source in accordance with IDAPA 58.01.01.317.

Table 6.1 - INSIGNIFICANT ACTIVITIES

Description	Insignificant Activities Section Citation IDAPA 58.01.01.17.01.B.i
Air Make Up Fan (Production)	IDAPA 58.01.01.317.01.b.i.5
Bin Dryer (by Proctor 3)	IDAPA 58.01.01.317.01.b.i.5

7. *ALTERNATIVE OPERATING SCENARIOS*

No alternative operating scenarios have been submitted by the permittee.

8. *TRADING SCENARIOS*

No trading scenarios have been submitted by the permittee.

9. *COMPLIANCE PLAN AND COMPLIANCE CERTIFICATION*

Pursuant to the information submitted by Idaho Fresh Pak, Inc. in the May 11, 2001 supplemental information for the Tier I operating permit (Tier I) Idaho Fresh Pak, Inc. has not obtained permits to construct (PTCs) for construction and/or modification of all emission sources at the facility in accordance with IDAPA

58.01.01.200 through 223. The sources listed in Table 9.1 were specifically identified as sources that were required to, but did not obtain, a PTC.

Table 7.1. SOURCES THAT NEED A PTC

Source	Date of Construction/Modification
Oroctor No.5	1980
92 Dryer 1	1992
92 Dryer 2	1992
92 Dryer 3	1999
Fresh Air Make Up Unit-Production	1993
Fresh Air Make Up Unit- Packaging	1993
Boiler No.3	2000
Baghouse 3-Packaging	1997
Baghouse 4-Packaging	1997
Baghouse 5-Packaging	1997
Mixing Room Baghouse	1992
Bag Room Dust Vacu-Lift	1998
Baghouse 1-Packaging	1997
Baghouse 2-Packaging	1997
92 Line 3 Baghouse	1999
92 Line 1 Stack Vacu-Lift	1992
92 Line 2 Stack Vacu-Lift	1993
92 Line 3 Stack Vacu-Lift	1999
Flaker Line 1	2001
Flaker Bagger Vacu-Lift	1994
92 Line 1 Vacu-Lift	1992
92 Line 2 Vacu-Lift	1993
Unleaded Gas Tank	1990
Diesel Tank	1990
Regular Gas Tank	1990
Fuel Oil Tank	2000
Propane Tank	1995
Flake Line 1 Baghouse	1999
Flaker Line 2	2001
Proctor 3	2000
Flaker Bagger Baghouse	1994
Bin Dryer	2000
Fresh Air Make Up Unit-Back Line	2000
Proctor 2-Front Line	1998
Fresh Air Make Up Unit-Front Line	1994
Flaker Line 2 Baghouse	2001

The permitee has the continuing responsibility to submit any supplementary information needed, including information on any other sources not included in this list, in accordance with IDAPA 58.01.01.315.

Because these sources have been constructed and/or modified without a permit, the Department has determined that the most appropriate course of action to bring the facility into compliance with the requirements is to issue a single facility-wide permit that:

a) specifically establishes the operating terms and conditions required by the PTC rules for sources for which a permit was required but not obtained; and

b) collectively addresses the operating terms and conditions required to demonstrate that emissions from all sources at the facility will not contribute to the violation of an applicable standard.

The Department is, therefore, requiring a combined Tier II operating permit (Tier II) and PTC (hereafter referred to as the facility-wide permit). The Tier II for Idaho Fresh Pak, Inc. is required in accordance with IDAPA 58.01.01.401.03 based on the determination that specific emission standards, or requirements on operation or maintenance are necessary to ensure compliance with any applicable emission standard or rule. The facility-wide permit will contain the terms and conditions necessary for the facility to comply with the applicable requirements of IDAPA 58.01.01.400 through 410.

The facility-wide permit will also include all of the terms and conditions for new or modified sources. For those sources within the facility that have existing PTCs, the terms and conditions will be incorporated into the new permit. For sources at the facility for which a PTC was required but not obtained, the permit will establish new emission limits, controls, and other requirements in accordance with the applicable portions of IDAPA 58.01.01.200 through 223. The new facility-wide permit will address all applicable emission standards, required emission control technology, and demonstrate that the facility will not cause or contribute to any ambient air quality standard or applicable prevention of significant deterioration (PSD) increment.

The combined Tier II and PTC is different than, and separate from, the Tier I in that the new permit will establish new applicable emission limits, controls, and other requirements that are as stringent as the requirements contained in or enforceable under the state implementation plan. This permit will create new underlying requirements for sources that are in existence at the time the initial Tier I is issued. A Tier I permit modification will, therefore, need to be issued concurrently with the issuance of the new facility-wide permit.

The applicable requirements established in the facility-wide permit pursuant to IDAPA 58.01.01.200 through 223 shall be clearly identified as such in the permit and shall remain in full force and effect until such time as they are modified or terminated in accordance with the procedures for issuing a PTC.

The specific compliance schedule elements and milestones to achieve compliance are described below.

Permit Condition 7.2. The permittee will be required to submit a complete permit application with all supporting information and documentation for issuance of a facility-wide permit in accordance with IDAPA 58.01.01.400 through 410 no later than 180 days from the final issuance date of the Tier I. A facility-wide permit is required by the Department to establish the terms and conditions necessary to comply with an applicable rule or standard. The Department shall consider the emissions from all sources at the facility and the specific requirements for individual sources in preparing the facility-wide operating permit.

The permit application shall clearly identify all emissions units at the facility—listing currently permitted emissions units, exempted units for which the facility maintains exemption documentation, units constructed before and not modified since January 24, 1969, and units constructed and/or modified since January 24, 1969 without a permit or construction approval from the Department. Application information shall provide facility information and emissions data for all emissions units in accordance with IDAPA 58.01.01.402 and 403 and shall include a demonstration that the sources at the facility will not cause or significantly contribute to a violation of the NAAQS or of any applicable PSD increment.

The application submittal deadlines have been set to reasonably accommodate updating and organizing the emissions unit descriptions and emissions data, and conducting ambient air quality modeling for all sources. Applications that are deemed or remain incomplete beyond the 180-day milestone shall constitute a violation of this permit condition.

Permit Condition 7.3. In addition to the information submitted under Permit Condition 7.2, the permittee is required to submit all of the information necessary to address the applicable requirements for PTCs in accordance with IDAPA 58.01.01.200 through 223 for the construction and/or modification of sources for which the permittee was required but did not obtain a PTC. The information must include all information to address the additional permit requirements for new major facilities or major modifications where construction without enforceable limits may have triggered PSD or nonattainment new source review (NSR) requirements.

This data must be submitted with the complete permit application required under Permit Condition 7.2 in order to issue a single combined permit. The information is, therefore, due no later than 180 days from the final issuance date of the Tier I. Failure to include complete information for addressing the PTC requirements within the required timeframe shall constitute a violation of this permit condition.

Permit Condition 7.4. If through the development of the facility-wide permit, any other source or sources are identified that should have obtained a PTC or PTC modification and for which the applicant did not include the information under Permit Condition 7.3, a supplemental application that contains all of the information necessary to address the applicable requirements for PTCs in accordance with IDAPA 58.01.01.200 through 223 shall be submitted no later than 30 days after receiving written notification from the Department. Supplemental applications that are deemed or remain incomplete beyond the 30-day milestone shall constitute a violation of this permit condition.

Permit Condition 7.5. If the permittee can clearly demonstrate that the data required for the facility-wide permit cannot be collected and organized within the specified timeframe, the permit application submittal deadlines may be extended at the discretion of the Department for a specific time period not to exceed one year. For the Department to consider a request for an extension without jeopardizing the terms and conditions of the permit, the request must be submitted by the facility no later than the midpoint of the compliance milestone timeline. The request must be submitted in writing with a clear demonstration why the data cannot reasonably be submitted within the specified timeframe. An example of information that might justify an extension is the absence of ambient monitoring data required to complete a PSD application.

The Department will review the request and the justification and approve or disapprove the extension in writing. The responsibility for meeting the schedule if the Department has not issued a written extension belongs to the permittee.

Permit Condition 7.6. The Department intends to draft and issue a single facility-wide permit to bring the permittee back into compliance. This permit will fully meet all of the applicable requirements in the *Rules* and the federally approved state implementation plan. Because the permit will contain both elements of PTCs and of Tier II permits, it will clearly identify the origin and basis for each term and condition. The terms and conditions established pursuant to the PTC requirements shall be clearly marked and shall not expire with any Tier II operating permit term. The terms and conditions established pursuant to the Tier II requirements shall be clearly marked and shall be implemented in accordance with the Tier II process. The procedures for issuing a PTC in IDAPA 58.01.01.209 shall be followed concurrently with the procedures for issuing a Tier II in IDAPA 58.01.01.404. The permit shall clearly state that any future modification of a term or condition in the permit shall be subject to the appropriate procedural requirements on which the original term or condition was based.

Permit Condition 7.7. Within 30 days after the facility-wide permit application is determined complete by the Department, the permittee will need to request a significant permit modification to the Tier I in accordance with IDAPA 58.01.01.382.02. A significant Tier I modification will require the payment of fees in accordance with IDAPA 58.01.01.389.06.b.iii. Because the information in a complete application as required under Permit Condition 7.2 and 7.3 should contain all of the technical information necessary to modify the Tier I, the Department may waive portions of the standard application requirements as appropriate provided the permittee certifies the completeness, truth, and accuracy of all documents submitted.

The Tier I modification shall be processed concurrently with the facility-wide permit in accordance with the procedures for issuing a Tier I in IDAPA 58.01.01.360 through 369.

Permit Condition 7.8. The permittee shall be required to submit a progress report at the end of each calendar quarter (January 1, April 1, July 1, and October 1) of each year stating when each of the conditions of each milestone were or will be achieved. A detailed explanation is required when milestones were not or will not be achieved in accordance with the schedule.

Permit Condition 7.9. The incorporation of the compliance schedule into the Tier I operating permit does not sanction noncompliance with the applicable rules.

10. ACID RAIN PERMIT

Idaho Fresh Pak, Inc. is not subject to the acid rain permitting requirements of 40 CFR 72 - 75. The facility is not an affected unit according to the definitions and applicability under 72.2 and 72.6. The Idahoan facility is a non-utility unit (72.6(b)(8)). "Unit" is defined as a fossil-fuel burning device and "utility" defined as any person that sells electricity.

11. AIRS DATABASE

AIRS/AFS[1] FACILITY-WIDE CLASSIFICATION[2] DATA ENTRY FORM

AIR PROGRAM / POLLUTANT	SIP	PSD	NSPS (Part 60)	NESHAP (Part 61)	MACT (Part 63)	TITLE V	AREA CLASSIFICATION A – Attainment U – Unclassifiable N – Nonattainment
SO_2	A	A				A	U
NO_x	A	A				A	U
CO^1	B						U
PM_{10}	B						U
PM	B		B				U
VOC	B						U
Total HAPs	B						U
			APPLICABLE SUBPART				
			Dc				

AIRS Facility Subsystem

AIRS/AFS CLASSIFICATION CODES:

- A = Actual or potential emissions of a pollutant are above the applicable major source threshold. For NESHAP only, class "A" is applied to each pollutant which is below the 10 ton-per-year (T/yr) threshold, but which contributes to a plant total in excess of 25 T/yr of all NESHAP pollutants.
- SM = Potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable regulations or limitations.
- B = Actual and potential emissions below all applicable major source thresholds.
- C = Class is unknown.
- ND = Major source thresholds are not defined (e.g., radionuclides).

12. REGISTRATION FEES

This facility is a major facility as defined by IDAPA 58.01.01.008.10; therefore, registration and registration fee, in accordance with IDAPA 58.01.01.387, apply.

13. RECOMMENDATION

Based on the Tier I application and review of the federal regulations and state rules, staff recommend that DEQ provide proposed Tier I operating permit No. 051-00017 to EPA for their review as required by IDAPA 58.01.01.366.

KK/HE/sm Project No. T1-9505-052-1 G:\AIR QUALITY\STATIONARY SOURCE\SS LTD\T1\IDAHOAN FOODS\FINAL\IDAHOAN FINAL TM.DOC