



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

C.L. "Butch" Otter, Governor
Toni Hardesty, Director

March 6, 2008

Certified Mail No. 7190 0596 0014 0000 2024

Chuck Tracy, Plant Manager
Idaho Fresh Pak, Incorporated
823 South Oneida
Rupert, Idaho 83350

RE: Facility ID No. 067-00010, Idaho Fresh Pak, Inc., Rupert, Idaho
Final Permit Letter

Dear Mr. Tracy:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-060447 to Idaho Fresh Pak, Inc. for the dryer No.2 and transfer baghouses located at Rupert, 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 October 12, 2006. This permit is effective immediately. This permit does not release Idaho Fresh Pak, Inc. from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Steve VanZandt, Air Quality Compliance Officer, at (208) 736-2190 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 Robert Baldwin at (208) 373-0502 or robert.baldwin@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".

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS\REB\hp

Project No. P-060447

Enclosures

Idaho Fresh Pak, Inc., Rupert
March 6, 2008
Page 2 of 2

HARD COPY TO FACILITY

en: Bill Allred, Steve VanZandt, Twin Falls Regional Office
Robert Baldwin, Permit Writer
Marilyn Seymore/ Pat Rayne, AQ Division
Stationary Source Administrative Assistant

en-web: Laurie Kral, U.S. EPA Region 10

ec: Chuck Tracy, ctracy@idahoan.com
Eric Hansen, Geomatrix, ehansen@geomatrix.com

c: Reading File (Ltr Only)
Source File
Permit Binder
Bill Rogers, Permit Coordinator (Ltr Only)
Phyllis Heitman, AQ Division (Ltr Only)



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

PERMIT No.: P-060447
FACILITY ID No.: 067-00010
AQCR: 63 **CLASS:** B
SIC: 2034 **ZONE:** 12
UTM COORDINATE (km): 279.8, 4720.4

1. PERMITTEE

Idaho Fresh Pak, Incorporated

2. PROJECT

PTC modification

3. MAILING ADDRESS

823 South Oneida

CITY

Rupert

STATE

ID

ZIP

83350

4. FACILITY CONTACT

Chuck Tracy

TITLE

Plant Manager

TELEPHONE

208-754-8011

5. RESPONSIBLE OFFICIAL

Chuck Tracy

TITLE

Plant Manager

TELEPHONE

208-754-8011

6. EXACT PLANT LOCATION

823 South Oneida

COUNTY

Minidoka

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Dehydrated potato products

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 (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 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.


 ROBERT BALDWIN, PERMIT WRITER
 DEPARTMENT OF ENVIRONMENTAL QUALITY


 MIKE SIMON, STATIONARY SOURCE PROGRAM MANAGER
 DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: March 6, 2008

Table of Contents

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE.....3

1. PERMIT TO CONSTRUCT SCOPE.....4

2. FLAKER DRUM DRYER 2 AND TWO BAGHOUSES.....5

3. NATURAL GAS BOILERS.....7

4. PERMIT TO CONSTRUCT GENERAL PROVISIONS.....8

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
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
gr	grain (1 lb = 7,000 grains)
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
lb/hr	pounds per hour
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
scf	standard cubic feet
SIC	Standard Industrial Classification
T/yr	tons per year
UTM	Universal Transverse Mercator

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-060447

Permittee: Idaho Fresh Pak, Inc

Location: Rupert, Idaho

Facility ID No. 067-00010

1. PERMIT TO CONSTRUCT SCOPE

Purpose

- 1.1 This PTC modification is to permit the emission sources of flaker drum dryer 2 and two product transfer baghouses at the Idaho Fresh Pak Rupert facility that were installed after 1969 and did not acquire Director's exemption.
- 1.2 This PTC replaces PTC No. 1020-0010, issued on January 3, 1984, the terms and conditions of which no longer apply.

Regulated Sources

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(s)
2	Flaker drum dryer 2	None
2	Product transfers	Baghouses
3	Natural gas boilers	None

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-060447

Permittee: Idaho Fresh Pak, Inc
Location: Rupert, Idaho

Facility ID No. 067-00010

2. FLAKER DRUM DRYER 2 AND TWO BAGHOUSES

2.1 The steam heated drum dryer 2 rotates and drives moisture from the potato cells. The removed moisture is exhausted uncontrolled through two stacks. The dried potato sheet is peeled from the drum and broken into smaller pieces. These flakes are transported pneumatically to the silo and warehouse storage.

The two baghouses exhaust through a common stack.

2.2 Emissions Control Description

Table 2.1 FLAKER DRUM DRYER DESCRIPTIONS

Emissions Processes	Emissions Control Device	Emissions Point
Flaker drum dryer 2	None	Drum 2 exhaust stack
Product transfers	Baghouses	Product transfer baghouses' exhaust stack

Emissions Limits

2.3 Emissions Limits

The PM₁₀ emissions from the drum dryer 2 stacks and the baghouses' stack shall not exceed any corresponding emission rate limits listed in Table 2.2.

Table 2.2 DRYER 2 AND BAGHOUSES EMISSIONS LIMITS

Source Description	PM ₁₀
	*lb/day
Flaker drum dryer 2	13.2
Product transfer baghouses	10.32

*lb/day is the total over a calendar day period

2.4 Opacity Limit

Emissions from the flaker drum dryer 2 stacks and the baghouses' stack, or any other stack, vent, or functionally equivalent opening associated with the flaker drum dryer and baghouses 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 Throughput Limits

The permittee shall not exceed a production rate of 23,280 pounds per calendar day of dried potato product from flaker drum dryer 2.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-060447

Permittee:	Idaho Fresh Pak, Inc
Location:	Rupert, Idaho

Facility ID No. 067-00010

2.6 Control Equipment

Within 60 days of issuance of this permit, the permittee shall have developed an O&M manual for the two baghouses. The O&M manual shall be based on the baghouse manufacturer's specifications and recommendations and shall describe the methods and procedures that will be followed to assure the baghouse is maintained in good working order. The O&M manual shall remain on site at all times and shall be made available to DEQ representatives upon request.

Monitoring and Recordkeeping Requirements

2.7 Throughput Monitoring

- The permittee shall monitor and record the total pounds of dried potato product from flaker drum dryer 2 each calendar day. The flaker drum dryer 2 production shall be determined by taking a proportional share of the total production of dried potato product produced per calendar day. The proportional share shall be determined by considering the number of hours of the day each flaker drum dryer operates and the rated hourly throughput capacity of each dryer. This shall determine compliance with Permit Conditions 2.3 and 2.5.
- The permittee shall monitor and record the total hours that each flaker drum dryer operates each calendar day.

2.8 Performance Test

Within 180 days of the issuance of this permit the permittee shall conduct a performance test on the stack of flaker drum dryer 2 to demonstrate compliance with Permit Condition 2.3. The permittee is encouraged to submit a source testing protocol for approval prior to conducting the performance test.

The permittee shall test in accordance with IDAPA 58.01.01.157 and General Provision 6 and shall monitor and record the following during the performance test:

- The daily throughput of flaker drum dryer 2 for 10 consecutive calendar days prior to and including the day of the performance test.
- While conducting the performance test, the calculated average throughput shall be at a minimum 80% of the permitted throughput stated in Permit Condition 2.5.
- The flaker drum dryer 2 production shall be determined by taking a proportional share of the total production of dried potato product produced per calendar day. The proportional share shall be determined by considering the number of hours of the day each flaker drum dryer operates and the rated hourly throughput capacity of each dryer.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-060447

Permittee: Idaho Fresh Pak, Inc

Location: Rupert, Idaho

Facility ID No. 067-00010

3. NATURAL GAS BOILERS

3.1 Idaho Fresh Pak has two 20 MMBtu/hr Bethlehem natural gas fired boilers to supply steam for the dryers when steam from a cogeneration facility is unavailable. The boilers were manufactured in 1984. The boilers were permitted and installed as coal fired boilers. The boilers were retrofitted in the 1990s to natural gas and were not considered by EPA as a modification subject to NSPS.

Emissions Limits

3.2 Opacity Limit

Emissions from each boiler stack, or any other stack, vent, or functionally equivalent opening associated with the boilers 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.

3.3 Emissions Limits

Particulate matter emissions from the gas-fired boilers' exhaust stack shall not exceed 0.015 grains per dry standard cubic foot of effluent gas adjusted to 3% oxygen by volume.

Operating Requirements

3.4 Allowable Fuel

The permittee shall operate the boilers exclusively on natural gas.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-060447

Permittee:	Idaho Fresh Pak, Inc
Location:	Rupert, Idaho

Facility ID No. 067-00010

4. 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;

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-060447

Permittee:	Idaho Fresh Pak, Inc	Facility ID No. 067-00010
Location:	Rupert, Idaho	

- 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]

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-060447

Permittee:	Idaho Fresh Pak, Inc	Facility ID No. 067-00010
Location:	Rupert, Idaho	

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)]