



State of Idaho
Department of Environmental Quality
Air Quality Division

**AIR QUALITY PERMIT
STATEMENT OF BASIS**

Permit to Construct No. P-2009.0026

Final

Idahoan Foods, LLC

Dubois, Idaho

Facility ID No. 033-00002

April 7, 2009

Eric Clark *EC*

Permit Writer

The purpose of this Statement of Basis is to satisfy the requirements of IDAPA 58.01.01. et seq, Rules for the Control of Air Pollution in Idaho, for issuing air permits.

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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
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
EPA	Environmental Protection Agency
gr/dscf	grain (1 lb = 7,000 grains) per dry standard cubic foot
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
m	meter(s)
MMBtu	million British thermal units
ng/J	nanograms per Joule
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM ₁₀	Particulate Matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppm	parts per million
PTC	Permit to Construct
Rules	Rules for the Control of Air Pollution in Idaho
scf	standard cubic feet
SIC	Standard Industrial Classification
SO ₂	sulfur dioxide
SO _x	sulfur oxides
T/yr	tons per any consecutive 12-month period
µg/m ³	micrograms per cubic meter
UTM	Universal Transverse Mercator
VOC	volatile organic compound

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Permittee:	Idahoan Foods, LLC	Permit No.	P-2009.0026
Location:	Dubois, Idaho	Facility ID No.	033-00002

1. FACILITY INFORMATION

1.1 Facility Description

Idahoan Foods, LLC processes dehydrated potato products at the facility located near Dubois, Idaho. The process primarily involves potato dehydration to make potato flakes. Potatoes are cleaned, peeled, cooked, and sized prior to being transferred into a drying unit. The main sources of emissions include boilers, dryers, dehydration lines, pneumatic material transfer equipment, and packaging lines. Some dryers are of the direct-fired type, and some use steam from the boilers.

1.2 Permitting Action and Facility Permitting History

This PTC is a revision of an existing PTC. Permit status is noted as active and in effect (A) or superseded (S).

< 1989	Potato processing facility constructed without a permit to construct. By 1990, the facility was operated by Blaine Larsen Processing, Inc., an Idaho corporation organized on November 19, 1990. The facility consisted of two boilers fired on #6 fuel oil and each rated at 30,000 pounds of steam per hour, four drum dryers, and one small steam peeler.
Late 1991 or early 1992	Boilers were converted to propane only, and an additional drum dryer was installed.
November 1996	Boiler No. 1 was installed. The facility discontinued using the two old boilers, which were later removed.
August 30, 2002	DEQ Idaho Falls office regional inspectors identified this unpermitted facility.
July 23, 2003	Notice of Violation issued to Blaine Larsen Farms (BLF) Dehydration Division.
June 2, 2004	Tier II operating permit and permit to construct (Tier II/PTC) T2-030514 was issued for facility equipment including 144 MMBtu/hr Boiler No. 1 (subject to NSPS Db) burning natural gas, propane, or any ASTM grade fuel oil; a Maxon fluidized bed dryer; a 3-stage National dryer; 12 flaker/drum type dryers; and flake packaging line, bulk line, Torit line, and drum negative air baghouse. Based on the limitations in this permit, this facility was a major Title V source for SO ₂ and NO _x . (S)
July 20, 2004	Notice of Violation issued to Blaine Larsen Farms Dehydration Division, Case No. E-020017. Boiler No. 1 was installed in 1996 and had a potential to emit more than 100 tons per year of NO _x , but the facility had not obtained a Tier I Operating Permit.
November 1, 2004	Consent Order, Case No. E-020007, was issued.
March 7, 2005	Tier II/PTC P-040525 (S) was issued to install a custom process cyclone to recover product from the tote dump station, and to install 6.7 MMBtu/hr natural gas-fired Boiler No. 2, and limit Boiler No. 1 fuel

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	oil to oil that meets the NSPS Subpart Db definition of “very low sulfur oil.”(S)
June 17, 2005	Consent Order, Case No. E-050009, was issued to impose NSPS Subpart Dc requirements upon de-rating of Boiler No. 1 and allow burning up to 1.75% sulfur fuel oil in Boiler No. 1, and include specific limits to keep PM ₁₀ emissions less than or equal to 99.7 tons per year. BLF was required to submit a complete PTC/Tier II application for these changes within 90 days of the June 27, 2005 effective date of the consent order, i.e., by September 25, 2005.
October 17, 2005	Receipt of a PTC/Tier II permit modification application (project T2-050509). Submittal of this application was required by the Consent Order for Case No. E-050009.
January 13, 2006	Tier II/PTC No. T2-050511 was issued to change the permittee name from BLF to RDO Processing, LLC (RDO), remove one-time source tests, change the PM schedule for Boiler No. 1, and require generation and maintenance of manuals instead of their development within 60 days of permit issuance.(S)
February 8, 2006	Consent Order, Case No. E-060001, effective date. This CO was issued to limit PM ₁₀ emissions to 99.7 tons per year (to remove RDO from the EPA High Priority Violators List).(S)
July 9, 2007	DEQ issued an ownership transfer acknowledgement letter for T2-050511 and permitting projects T2-060510, P-2007.0017, and T1-030535. Ownership of this facility was transferred from RDO Processing, LLC to North American Foods, LLC.(S)
April 4, 2008	Permit to Construct and Tier II Operating Permit T2-060510 was issued to permit a third 30,000-gallon fuel oil storage tank, replace throughput limitations specified in the Consent Order for the Flaker Drum Dryers, National Dryer, and Fluidized Bed Dryer intended to keep PM ₁₀ emissions below 100 tons per year (T/yr) with the modeled emission rates for permit (A, until issuance of this permit which it will then become S)

2. APPLICATION SCOPE AND APPLICATION CHRONOLOGY

2.1 Application Scope

This project is a PTC revision for a facility name, facility contact, and responsible official change. No other substantive changes were made to the permit.

2.2 Application Chronology

February 20, 2009	DEQ received a request for a facility name change from Idahoan Foods, LLC
March 26, 2009	DEQ sent a draft PTC to the facility for review.
April 7, 2009	DEQ issues final permit and statement of basis.

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3. TECHNICAL ANALYSIS

This section lists the emissions units, describes the production or manufacturing processes, and provides the emissions inventory for this facility. For details regarding the emissions units, process descriptions, and the emissions inventory for this facility, refer to the Statement of Basis for PTC No. P-2007.0017, issued on April 21, 2008. This information was not changed as a result of this project.

4. REGULATORY REVIEW

This section lists the regulatory requirements for the emissions units at this facility. For details regarding these regulatory requirements, refer to the Statement of Basis for PTC No. P-2007.0017, issued on April 21, 2008. This information was not changed as a result of this project.

5. PERMIT FEES

In accordance with IDAPA 58.01.01.225 no fees are required for name and ownership changes that meet the requirements of IDAPA 58.01.01.224.03. This project meets these requirements. Therefore, no processing fee is required for this project.

6. PUBLIC COMMENT

An opportunity for public comment period on the PTC application is not required for name changes in accordance with IDAPA 58.01.01.209.04. Therefore, a public comment period was not provided for this project.

Appendix A – AIRS Information

AIRS/AFS Facility-wide Classification Form

Facility Name: Idahoan Foods, LLC - Dubois
Facility Location: 72 Dehigh Road, Dubois, Idaho 83423
Facility ID: 033-00002 **Date:** April 7, 2009
Project/Permit No.: P-2009.0026 **Completed By:** Eric Clark

Check if there are no changes to the facilitywide classification resulting from this action. (compare to form with last permit)

Yes, this facility is an SM80 source.

Identify the facility's area classification as A (attainment), N (nonattainment), or U (unclassified) for the following pollutants:

	SO2	PM10	VOC	
Area Classification:	U	U	U	DO NOT LEAVE ANY BLANK

Check one of the following:

SIP [0] - Yes, this facility is subject to SIP requirements. (do not use if facility is Title V)

OR

Title V [V] - Yes, this facility is subject to Title V requirements. (If yes, do not also use SIP listed above.)

For SIP or TV, identify the classification (A, SM, B, C, or ND) for the pollutants listed below. Leave box blank if pollutant is not applicable to facility.

	SO2	NOx	CO	PM10	PT (PM)	VOC	THAP
Classification:	A	A	B	A	A	B	B

PSD [6] - Yes, this facility has a PSD permit.

If yes, identify the pollutant(s) listed below that apply to PSD. Leave box blank if pollutant does not apply to PSD.

	SO2	NOx	CO	PM10	PT (PM)	VOC	THAP
Classification:	<input type="checkbox"/>						

NSR - NAA [7] - Yes, this facility is subject to NSR nonattainment area (IDAPA 58.01.01.204) requirements.

Note: As of 9/12/08, Idaho has no facility in this category.

If yes, identify the pollutant(s) listed below that apply to NSR-NAA. Leave box blank if pollutant does not apply to NSR - NAA.

	SO2	NOx	CO	PM10	PT (PM)	VOC	THAP
Classification:	<input type="checkbox"/>						

NESHAP [8] - Yes, this facility is subject to NESHAP (Part 61) requirements. (THAP only)

If yes, what CFR Subpart(s) is applicable?

NSPS [9] - Yes, this facility is subject to NSPS (Part 60) requirements.

If yes, what CFR Subpart(s) is applicable?

A Db

If yes, identify the pollutant(s) regulated by the subpart(s) listed above. Leave box blank if pollutant does not apply to the NSPS.

	SO2	NOx	CO	PM10	PT (PM)	VOC	THAP
Classification:	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

MACT [M] - Yes, this facility is subject to MACT (Part 63) requirements. (THAP only)

If yes, what CFR Subpart(s) is applicable?