



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

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

August 27, 2007

Certified Mail No. 7102 0243 6844 0000 0250

Ross Bennett
Technical Services Manager
Norsun Food Group, Inc.
900 East 3000 North
Sugar City, ID 83448

RE: Facility ID No. 065-00013, Norsun Food Group, Inc., Sugar City
Final Permit Letter

Dear Mr. Bennett:

The Idaho Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2007.0092 to Norsun Food Group, Inc. for the potato production increase project at Sugar City, in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho).

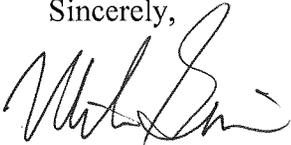
This permit is based on your permit application received on May 31, 2007. This permit is effective immediately and replaces PTC No. P-050501, issued on June 16, 2005, the terms and conditions of which no longer apply. This permit does not release Norsun Food Group, Inc. from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

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 Idaho Falls Regional Office, 900 N. Skyline, Suite B, Idaho Falls, ID 83402, Fax (208) 528-2695.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Aaron Swift, Air Quality Analyst, at 208-528-2650 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 Shawnee Chen at (208) 373-0502 or Shawnee.chen@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,



Mike Simon
Stationary Source Program Manager
Air Quality Division

MS\SYC\sd

Project No. P-2007.0092

Enclosures

- en: Rensay Owen, Aaron Swift, Idaho Falls Regional Office
Shawnee Chen, P.E., Senior Air Quality Engineer
Marilyn Seymore/ Pat Rayne, AQ Division
- en-web: Laurie Kral, U.S. EPA Region 10
- ec: Ross Bennett [rbennett@norsun.com]
Rick.McCormick, CH2M, Rick.McCormick@CH2M.com
- c: Source File
Permit Binder
Bill Rogers, Permit Coordinator (Ltr Only)
Phyllis Heitman, AQ Division (Ltr Only)
Reading File (Ltr Only)



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

PERMIT No.: P-2007.0092
FACILITY ID No.: 065-00013
AQCR: 61 **CLASS:** B
SIC: 2037 **ZONE:** 12
UTM COORDINATE (km): 438.9, 4857.3

1. PERMITTEE

Norsun Food Group, Inc.

2. PROJECT

Permit to Construct Modification – Production Increase

3. MAILING ADDRESS

900 East 3000 North

CITY

Sugar City

STATE

ID

ZIP

83448

4. FACILITY CONTACT

Ross Bennett

TITLE

Technical Services Manager

TELEPHONE

208-356-4149 x 119

5. RESPONSIBLE OFFICIAL

Ross Bennett

TITLE

Technical Services Manager

TELEPHONE

208-356-4149 x 119

6. EXACT PLANT LOCATION

903 East 3000 North, Sugar City, Idaho

COUNTY

Madison

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Potato processing plant, including pre-cooked potato products

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.

SHAWNEE CHEN, P.E. PERMIT WRITER
 DEPARTMENT OF ENVIRONMENTAL QUALITY

MIKE SIMON, STATIONARY SOURCE PROGRAM
 MANAGER
 DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE MODIFIED/REVISED:

August 27, 2007

DATE ISSUED:

June 16, 2005

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Acronyms, Units, and Chemical Nomenclature

AQCR	Air Quality Control Region
CFR	Code of Federal Regulations
DEQ	Department of Environmental Quality
gr/dscf	grain (1 lb = 7,000 grains) per dry standard cubic feet
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/day	pounds per day
m	meter(s)
MMBtu/hr	million British thermal units per hour
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
PTC	permit to construct
SIC	Standard Industrial Classification
UTM	Universal Transverse Mercator

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2007.0092

Permittee:	Norsun Food Group, Inc.	Facility ID No. 065-00013
Location:	Sugar City, Idaho	

1. PERMIT SCOPE

Purpose

- 1.1 This permitting action is for an increase of the facility's potato production capability. Specifically, the permittee has requested to
- increase the heat input rate of the existing Clayton natural gas-fired steam boiler from 12.8 million British thermal units per hour (MMBtu/hr) to 14.6 MMBtu/hr; and
 - replace A-line oven's Eclipse burners from six burners to four burners and replace the APV A-line oven with a new custom built in-place oven by Idaho Steel.

[8/27/07]

- 1.2 The following is a chronological history of permits issued at this facility, the terms and conditions of which shall no longer apply:
- PTC No. P-050501, issued June 16, 2005, a PTC revision for minor corrections of the permit.
 - PTC No. P-040511, issued January 27, 2005, an initial PTC for the construction of the facility without first obtaining a PTC.

[8/27/07]

Regulated Sources

- 1.3 Table 1.1 lists all sources of regulated emissions in this permit.

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Section	Source Description	Emissions Control(s)
2	<u>Steam Boiler</u>	None
	<u>Ovens:</u> A-line Oven B-line Oven R & D Oven	
	<u>Natural gas-fired space heaters:</u> One line heater (roof mounted) One office heater (pulse) two office 9200 heaters One shop heater One lab heater One boiler room heater two C-line room heaters two A& B line room heaters	
	<u>One steam peeler</u>	
2, 3	Steam Boiler (14.645 MMBtu/hr)	
2, 4	A-line and B-line Ovens	

[8/27/07]

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2007.0092

Permittee: Norsun Food Group, Inc.

Location: Sugar City, Idaho

Facility ID No. 065-00013

2. FACILITY-WIDE CONDITIONS

Fugitive Emissions

- 2.1 All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of particulate matter. Some of the reasonable precautions include, but are not limited to, the following:
- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands.
 - Application, where practical, of asphalt, oil, water, or suitable chemicals to, or covering of, dirt roads, material stockpiles, and other surfaces which can create dust.
 - Installation and use, where practical, of hoods, fans, and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
 - Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts.
 - Paving of roadways and their maintenance in a clean condition, where practical.
 - Prompt removal of earth or other stored material from streets, where practical.
- 2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.
- 2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.
- 2.4 The permittee shall conduct a quarterly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (If observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

Odors

- 2.5 The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

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Permittee:	Norsun Food Group, Inc.	Facility ID No. 065-00013
Location:	Sugar City, Idaho	

2.6 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall, at a minimum, include the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

Visible Emissions

2.7 The permittee shall not 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 procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, NO_x, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.

2.8 The permittee shall conduct a quarterly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see evaluation for each potential source. If any visible emissions are present from any point of emission, the permittee shall 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 greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each visible emissions inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

Excess Emissions

2.9 RESERVED

[8/27/07]

Open Burning

2.10 The permittee shall comply with the requirements of IDAPA 58.01.01.600-617, *Rules for Control of Open Burning*.

[8/27/07]

Monitoring and Recordkeeping

2.11 RESERVED

[8/27/07]

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2007.0092

Permittee: Norsun Food Group, Inc.

Location: Sugar City, Idaho

Facility ID No. 065-00013

Reports and Certifications

- 2.12 Any reporting required by this permit, including but not limited to, records, monitoring data, supporting information, requests for confidential treatment, notifications of intent to test, 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. Any reporting required by this permit shall be submitted to the following address:

Air Quality Permit Compliance
Department of Environmental Quality
Idaho Falls Regional Office
900 Skyline, Suite B
Idaho Falls, ID 83402
Phone: (208) 528-2650
Fax: (208) 528-2695

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2007.0092

Permittee:	Norsun Food Group, Inc.	Facility ID No. 065-00013
Location:	Sugar City, Idaho	

3. STEAM BOILER

3.1 Process Description

The natural gas-fired steam boiler was manufactured by Clayton in 1998. The rated heat input capacity of the boiler is increased from 12.8 MMBtu/hr to 14.645 MMBtu/hr after this modification.

[8/27/07]

3.2 Emission Control Description

Emissions from the natural gas-fired boiler are uncontrolled.

Emission Limits

3.3 Emission Limit

The permittee shall not discharge to the atmosphere from the steam boiler particulate matter (PM) in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas in accordance with IDAPA 58.01.01.675.

OPERATING REQUIREMENTS

3.4 Fuel Type

The steam boiler shall be fueled exclusively on natural gas.

Reporting and Recordkeeping Requirements for Steam Boiler

3.5 Monitoring and Recordkeeping Requirement

The permittee shall monitor and maintain records of the amounts of natural gas combusted in the steam boiler during each calendar month in accordance with 40 CFR 60 Subpart Dc. The records shall be maintained by the permittee for a period of five years following the date of such record.

[8/27/07]

3.6 Reporting Requirement

The permittee shall submit notification of the date of construction or reconstruction, and actual startup, as provided by 40 CFR 60.7. This notification shall include the design heat input capacity of the steam boiler and identification of fuels to be combusted in the steam boiler.

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Permittee:	Norsun Food Group, Inc.	Facility ID No. 065-00013
Location:	Sugar City, Idaho	

4. A-LINE AND B-LINE OVENS

4.1 Process Description

A new custom built in-place oven by Idaho Steel will replace the existing APV A-Line process oven. The burner is manufactured by Eclipse (model number RM200). The number of burners in the oven will be changed from six burners to four burners after this modification. Each burner has a rated heat input capacity of 2.45 MMBtu/hr. Natural gas is used exclusively as the fuel type. Emissions exit through a single stack that is 33.08 feet in height from ground level. The stack is a non-circular vent with dimensions of 8 inches x 8 inches.

[8/27/07]

The Kiremko B-Line process oven was manufactured by Kiremko BV in 1999. The oven's model number is R0755-IMP-99. The oven has eight burners manufactured by Eclipse (model number RM200); each with a rated heat input capacity of 2.0 MMBtu/hr. Natural gas is used exclusively as the fuel type. Emissions exit through a single stack that is 35.0 feet in height from ground level. The stack is a non-circular vent with dimensions of 17.5 inches x 31.5 inches.

4.2 Emission Control Description

Emissions from the A-Line and B-Line process ovens are uncontrolled.

Emission Limits

4.3 Emission Limits

The PM₁₀ emissions from the A-line and B-line process oven stacks shall not exceed any corresponding emissions rate limit listed in Table 4.1.

Table 4.1 A-LINE AND B-LINE OVENS EMISSIONS LIMITS

Source Description	PM ₁₀ lb/day
A-line oven	4.152
B-line oven	2.76

[8/27/07]

Operating Requirements

4.4 Throughput Limits

- The maximum daily throughput of finished potato product from the A-Line process oven shall not exceed 180 tons per day.
- The maximum daily throughput of finished potato product from the B-Line process oven shall not exceed 120 tons per day.

[8/27/07]

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Permittee:	Norsun Food Group, Inc.	Facility ID No. 065-00013
Location:	Sugar City, Idaho	

4.5 Fuel Type

The A-Line process oven and the B-Line process oven shall be fueled exclusively on natural gas.

Monitoring and Recordkeeping Requirements

4.6 Monitoring Requirement

The permittee shall monitor and record the throughput of finished potato product from the A-Line process oven and the B-Line process oven on a daily basis to demonstrate compliance with Permit Condition 4.4. Throughput shall be recorded as tons. Records of this information shall be maintained in accordance with General Provision 7.

[8/27/07]

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Permittee: Norsun Food Group, Inc.

Location: Sugar City, Idaho

Facility ID No. 065-00013

5. 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;

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Permittee: Norsun Food Group, Inc.	Facility ID No. 065-00013
Location: Sugar City, 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-2007.0092

Permittee: Norsun Food Group, Inc.

Facility ID No. 065-00013

Location: Sugar City, 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.