



State of Idaho
Department of Environmental Quality
Air Quality Division

**AIR QUALITY PERMIT
STATEMENT OF BASIS**

Tier I Operating Permit No. T1-030535

FINAL

Idahoan Foods, LLC

Dubois, Idaho

Facility ID No. 033-00002

August 10, 2009

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and

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Permit Writers

The purpose of this Statement of Basis is to set forth the legal and factual basis for the Tier I operating permit terms and conditions including references to the applicable statutory or regulatory provisions for the terms and conditions as required by IDAPA 58.01.01.362

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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
Btu	British thermal unit
CAA	Clean Air Act
CEMS	Continuous Emissions Monitoring System
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
gr	grain (1 lb = 7,000 grains)
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
gpm	gallons per minute
HAP	hazardous air pollutants
hp	horsepower
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
kpa	kilopascal
lb/hr	pounds per hour
m	meter(s)
MACT	Maximum Achievable Control Technology
$\mu\text{g}/\text{m}^3$	micrograms per cubic meter
MMBtu	million British thermal units
MRRR	Monitoring, Recordkeeping and Reporting Requirements
NAICS	North American Industry Classification System
NESHAP	National Emission Standards for Hazardous Air Pollutants
Ng/J	nanogram per joule
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
PC	permit condition
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppm	parts per million
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
Rules	Rules for the Control of Air Pollution in Idaho
scf	standard cubic feet
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SM	Synthetic Minor
SO ₂	sulfur dioxide

SO _x	sulfur oxides
TAP	toxic air pollutant
Tier I	Tier I operating permit
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

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1. INTRODUCTION AND APPLICABILITY

Idahoan Foods, LLC (Idahoan) is a manufacturer of dehydrated potato products and is located at 72 Dehigh Road, Dubois, Idaho. The facility is classified as a major facility as defined by IDAPA 58.01.01.008.10.c because it emits or has the potential to emit PM, PM₁₀, SO₂, and NO_x above the major source threshold of 100 tons-per-year. At the time of this permitting action, the facility is not a major source of HAP emissions. As a major facility, Idahoan is required to apply for a Tier I operating permit pursuant to IDAPA 58.01.01.301. The application for a Tier I operating permit must contain a certification from Idahoan as to its compliance status with all applicable requirements (IDAPA 58.01.01.314.09).

IDAPA 58.01.01.362 requires that as part of its review of the Tier I application, DEQ shall prepare a technical memorandum (i.e. statement of basis) that sets forth the legal and factual basis for the draft Tier I operating permit terms and conditions including reference to the applicable statutory provisions or the draft denial. This document provides the basis for the draft Tier I operating permit for Idahoan.

The format of this Statement of Basis follows that of the permit with the exception of the facility's information discussed first followed by the scope, the applicable requirements and permit shield, and finally the general provisions.

The Idahoan Tier I operating permit is organized into sections. They are as follows:

Section 1 – Tier I Operating Permit Scope

The scope describes this permitting action.

Section 2 – Facility-Wide Conditions

The Facility-wide Conditions section contains the applicable requirements (permit conditions) that apply facility-wide. Where required, monitoring, recordkeeping and reporting requirements sufficient to assure compliance with each permit condition follows the permit condition.

Sections 3 through 5 – Emissions Unit/Source Name

The emissions unit-specific sections of the permit contain the applicable requirements that specially apply to each regulated emissions unit. Some requirements that apply to an emissions unit (e.g. opacity limits) may be contained in the facility-wide conditions. As with the facility-wide conditions, monitoring, recordkeeping and reporting requirements sufficient to assure compliance with each applicable requirement immediately follows the applicable requirement.

Section 6 – Non-applicable Requirements and Insignificant Activities

This section lists those requirements that the applicant has requested as non-applicable, and DEQ proposes to grant a permit shield in accordance with IDAPA 58.01.01.325.

If requested by the applicant, this section also lists emissions units and activities determined to be insignificant activities based on size or production as allowed by IDAPA 58.01.01.317.01.b. The facility's Tier I application supplied a list of activities deemed as insignificant and subject to IDAPA 58.01.01.317.01.b

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Section 7 – General Provisions

The final section of the permit contains standard terms and conditions that apply to all major facilities subject to IDAPA 58.01.01.300. This section is the same for all Tier I sources. These conditions have been reviewed by EPA and contain all terms required by IDAPA 58.01.01 et al as well as requirements from other air quality laws and regulations. Each general provision has been paraphrased so it is more easily understood by the general public; however, there is no intent to alter the effect of the requirement. Should there be a discrepancy between a paraphrased general provision in this statement of basis and the rule or permit, the rule or permit shall govern.

2. FACILITY INFORMATION

2.1 Facility Description

Idahoan processes dehydrated potato products at its 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 primary 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.

2.2 Facility Permitting History

2.2.1 Tier I Operating Permit History –

This permitting action is the initial Tier I Operating Permit for Idahoan. There is no previous Tier I permitting history for this facility.

2.2.2 Underlying Permit History – Includes every underlying permit issued to this facility

The following information is the comprehensive permitting history of all underlying applicable permits issued to this Tier I facility. This information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

- | | |
|----------------|---|
| April 7, 2009 | P-2009.0026, Facility name, facility contact, and responsible official change issued to Idahoan Foods, LLC (formerly North American Foods, LLC). Permit status (A). |
| April 21, 2008 | P-2007.0117, Remove the specific limit on fuel oil nickel content, modify the scrubber stack parameters, remove NSPS Subpart Kb requirements for the storage tanks, and convert the PTC/Tier II combo permit to a PTC. Permit status (S) by P-2009.0026. |
| 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 this permit, and to make the following changes to Boiler No. 1: <ul style="list-style-type: none"> • Increase the rated capacity from 99 MMBtu/hr (subject to Dc) to 150 MMBtu/hr (subject to Db, modified after February 28, 2005), |

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- Increase the permitted maximum residual fuel oil consumption in this boiler from 17,748 gallons to 24,984 gallons per day,
- Increase the permitted maximum residual fuel oil consumption from 5,176,536 gallons to 9,119,160 gallons per year,
- Include biodiesel as an approved fuel type for use in the boiler (added to the scope in the facility draft comments),
- Reflect the installation of a scrubber with a venturi on Boiler No. 1 to control SO₂ and PM/PM₁₀ emissions, and
- Incorporate Consent Order conditions to replace the exclusive use of very low sulfur fuel oil (i.e., less than 0.3% by weight) with ASTM Grades 1 through 6 fuel oil that meet IDAPA rules for sulfur content (i.e., maximum residual fuel oil sulfur content of 1.75% by weight).

Permit Status (S) by P-2007.0017

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. Permit Status (S) by T2-060510
August 30, 1996	DEQ received an updated Tier I permit application from RDO Processing LLC.
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)
February 6, 2006	PTC/Tier II permit modification application (T2-050509) was withdrawn.
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. Permit Status: (S) by T2-060510.
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.
September 13, 2005 November 3-4, 2005	Boiler No. 1 performance tests were conducted which showed that the boiler emissions exceeded the PM and PM ₁₀ limits in permit P-040524.
July 14, 2005	EPA letter was issued approving de-rating Boiler No. 1 from a NSPS Subpart Db affected emissions unit to NSPS Subpart Dc.
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.
January 3, 2005	Receipt of test protocol for de-rating Boiler No. 1 below 100 MMBtu/hr.
March 7, 2005	Tier II/PTC P-040525 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 oil to oil that meets the NSPS Subpart Db definition of "very low sulfur oil."

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	Permit Status: (S) by T2-050511.
April 25, 2005	Receipt of request to burn up to 1.75% sulfur fuel oil in Boiler No. 1, de-rate the boiler, and to limit production to keep facility-wide PM ₁₀ emissions below 100 tons per year.
November 1, 2004	Consent Order, Case No. E-020007, was issued.
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.
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 . Permit Status: (S) by Tier II/PTC P-040525.
December 15, 2003	Tier I operating permit application determined to be complete.
October 15, 2003	Receipt of a Tier I operating permit application (T1-030535).
July 23, 2003	Notice of Violation issued to Blaine Larsen Farms (BLF) Dehydration Division.
May 23, 2003	Receipt of PTC application and modeling report.
August 30, 2002	DEQ Idaho Falls office regional inspectors identified this unpermitted facility.
November 1996	Boiler No. 1 was installed. The facility discontinued using the two old boilers, which were later removed.
Late 1991 or early 1992	Boilers were converted to propane only, and an additional drum dryer was installed.
< 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.

3. APPLICATION SCOPE AND APPLICATION CHRONOLOGY

3.1 Application Scope

This permit is the initial Tier I operating permit for this facility.

3.2 Application Chronology

October 15, 2003	Tier I Operating Permit application received under the name of Blaine Larson Farms
December 15, 2003	Application deemed complete
2004 – May 2006	Application was back-logged at DEQ
May 4, 2006	Updated modeling submitted to DEQ due to facility change
July 7, 2006	Modeling deemed invalid. Modeling was corrected.

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August 30, 2006 Updated Tier I application was submitted with new modeling results under the name of RDO Processing LLC.

March 30, 2009 Application review began

4. EMISSIONS UNITS, PROCESS DESCRIPTION(S), AND EMISSIONS INVENTORY

This section lists the emissions units, describes the production or manufacturing processes, and provides the emissions inventory for this facility. The information presented was provided by the applicant in its permit application. Also listed in this section are the insignificant activities based on size or production rate.

4.1 Process No. 1 – Boiler No. 1 – Nebraska D-Series Boiler

A 150 MMBtu/hr Nebraska Boiler (Boiler No. 1) produces steam for the production of dehydrated potato products which includes steam peeling, blanching, cooking and drying operations. Boiler No. 1 utilizes a low-NO_x burner to reduce NO_x emissions and a wet scrubber/venturi to reduce SO₂ emissions and provide control for particulate matter (PM) emissions. Boiler No. 1 is an affected facility under the New Source Performance Standards (NSPS) of 40 CFR Part 60, Subpart Db. Boiler No. 1 may combust propane, natural gas, biodiesel meeting the specifications of ASTM D6751, or any ASTM grade of fuel oil containing no more than 1.75 weight percent sulfur. Monitoring capabilities for the boiler emissions include a PM CEMS and a NO_x CEMS. A SO_x CEMS is used when fuel oil is combusted except when combusting low sulfur fuel oil the SO_x CEMS is not required.

Table 4.1 lists the emissions units and control devices associated with Boiler 1 – Nebraska D-Series boiler.

Table 4.1 EMISSION UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION

Emission Unit ID No.	Emissions Unit Description	Control Device Description (if applicable)	Emissions Discharge Point ID No. or Description
Boiler No. 1	Manufacturer: Nebraska Boiler Manufacture Date: 1996 Modified: after Feb 28, 2005 Model: NS-F-89-ECON, Serial No. D-3465 Burner Type: Horizontally-fired, Low NO _x burner Rating: 150 MMBtu/hr Heat Release Rate: 73,400 Btu/hr-ft ³ Fuels/Max Usage: ASTM Grades 1 - 6 fuel oil and ASTM Spec. Biodiesel (max 1.75% S): 1,041 gal/hr, 9.12E6 gal/year Propane: 1,596 gal/hr, 1.4E07 gal/yr Natural Gas	<u>Lime Slurry Scrubber with venturi</u> Mfr: Innovative Scrubber Solutions, Inc. Efficiency: 92% for SO ₂ Mfr Guarantee: 0.03 lb/MMBtu for PM ₁₀	<u>BOILER NO. 1 Stack:</u> Stack Height: 101 feet Stack Exit Diameter: 5.25 feet Exhaust Flow Rate: 43,457 acfm Exit Gas Temperature: 123°F

4.2 Process No. 2 – Boiler No. 2 – Superior Boiler Works Boiler

A 6.7 MMBtu/hr Superior Boiler Works, Inc., boiler (Boiler No. 2) produces hot water and steam for the production of dehydrated potato products which includes hot water for the agglomerated product line, steam for the Ryan's line, and steam for several production lines while the plant during facility shutdown. Boiler No. 2 does not utilize any air pollution control equipment and is not an affected

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facility under the New Source Performance Standards (NSPS) of 40 CFR Part 60 Subpart Dc due to its size. Boiler No. 2 is fueled by natural gas or propane.

Table 4.2 lists the emissions units and control devices associated with Boiler No. 2 – Superior Boiler Works boiler.

Table 4.2 EMISSION UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION

Emission Unit ID No.	Emissions Unit Description	Control Device Description (if applicable)	Emissions Discharge Point ID No. or Description
Boiler No. 2	Manufacturer: Superior Boiler Works Model: 6-5-100-S150-GP Burner Type: Horizontally-fired Rating: 6.7 MMBtu/hr Fuels: Propane, natural gas Fuel Usage: max. 6,381 scf/hr, 55.9 MMscf/year	No Control Device	Stack Height: 41.42 feet Stack Exit Diameter: 1.66 feet Exhaust Flow Rate: 2,880 acfm Exit Gas Temperature: 355°F

4.3 Process No. 3 – Dryer Processes and Material Transfer Systems

The Idahoan Foods, LLC, facility near Dubois, Idaho, processes potatoes. The primary activity involves potato dehydration to make potato flakes. The processes addressed by this section are listed in Table 4.3 and this includes dryers, dehydration lines, and material transfer systems. Emissions from each of these sources are uncontrolled except for the Flake Packaging material transfer systems which are controlled by baghouses.

Table 4.3 lists the emissions units and control devices associated with Dryer Processes and Material Transfer Systems.

Table 4.3 EMISSION UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION

Emission Unit ID No.	Emissions Unit Description	Control Device Description (if applicable)	Emissions Discharge Point ID No. or Description
Drum Dryer 1-12	Manufacturer: Various Model: Various Feed Material: Potatoes Rated Capacity: 90,000 lb/hr	No Control Device	Stack Height: 45.58 feet, with cap Vertical discharge Stack Exit Diameter: 3.58 feet Modeled Flow Rate: 0.0033 ft/sec Exit Gas Temperature: 125°F
National Dryers A1, A2	Manufacturer: National Dryer Model: Eclipse 200 AM Burner Type: Horizontally-fired Rating: 3.6 MMBtu/hr Fuels: propane, natural gas Feed Material: Potatoes Process Rated Capacity: 1,500 lb/hr	No Control Device	<u>NAT_A1 Stack:</u> Stack Height: 46 feet, no cap Vertical discharge Stack Diameter: 2.68 ft ^a Modeled: Stack Exit Diameter: 0.0033 feet Exhaust Flow Rate: 1.7E-06 acfm Exit Gas Temperature: 150°F <u>NAT_A2 Stack:</u> Stack Height: 46 feet, no cap Vertical discharge Modeled: Stack Exit Diameter: 0.0033 feet Exhaust Flow Rate: 1.7E-06 acfm Exit Gas Temperature: 176°F

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Table 4.3 EMISSION UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION

Emission Unit ID No.	Emissions Unit Description	Control Device Description (if applicable)	Emissions Discharge Point ID No. or Description
National Dryer B	Manufacturer: National Dryer Model: Eclipse 160 AM Burner Type: Horizontally-fired Rating: 3.6 MMBtu/hr Fuels: propane, natural gas Feed Material: Potatoes Process Rated Capacity: 1,500 lb/hr	No Control Device	<u>NAT B Stack:</u> Stack Height: 46 feet, no cap Vertical discharge Stack Exit Diameter: 0.0033 feet Exhaust Flow Rate: 1.7E-06 acfm Exit Gas Temperature: 167°F
National Dryer C	Manufacturer: National Dryer Model: Eclipse 160 AM Burner Type: Horizontally-fired Rating: 3.6 MMBtu/hr Fuels: propane, natural gas Feed Material: Potatoes Process Rated Capacity: 1,500 lb/hr	No Control Device	<u>NAT C Stack:</u> Stack Height: 46 feet, no cap Vertical discharge Modeled: Stack Exit Diameter: 0.0033 feet Exhaust Flow Rate: 1.7E-06 acfm Exit Gas Temperature: 148°F
Fluidized Bed Dryer	Manufacturer: Maxon Model: Ovenpak 400, Size 415H Burner Type: Horizontally-fired Rating: 4.5 MMBtu/hr Fuels/Max Usage: Propane, natural gas Feed Material: Potatoes Process Rated Capacity: 2,000 lb/hr	No Control Device	Stack Height: 39.42 feet Horizontal discharge Stack Diameter: 1.92 ft ^a Modeled: Stack Exit Diameter: 0.0033 feet Exhaust Flow Rate: 1.7E-06 acfm Exit Gas Temperature: 110°F
Flake Packaging Bulk Line	Manufacturer: Various Model: Various Feed Material: Potato Flakes Rated Capacity: 12,000 lb/hr	<u>Primary: Cyclone:</u> Mfr: Idaho Steel Efficiency: 90% <u>Secondary: Baghouse:</u> Mfr: Micropulsair Model: #25-S-8-30-C Efficiency: 99%	<u>FP BULK Stack:</u> Stack Height: 38.75 feet Stack Exit Diameter: 0.33 feet Exhaust Flow Rate: 1,675 acfm Exit Gas Temperature: 68°F (ambient)
Flake Packaging Line	Manufacturer: Various Model: Various Feed Material: Potato Flakes Rated Capacity: 8,000 lb/hr	<u>Primary: Cyclone:</u> Mfr: Idaho Steel Efficiency: 90% <u>Secondary: Baghouse:</u> Mfr: Micropulsair Model: #12-8-160C Efficiency: 99%	<u>FP Stack:</u> Stack Height: 39.59 feet Stack Exit Diameter: 4 feet Exhaust Flow Rate: 14,024 acfm Exit Gas Temperature: 68°F (ambient)
Flake Torit Packaging Line	Manufacturer: Various Model: Various Feed Material: Potato Flakes Rated Capacity: 8,000 lb/hr	<u>Baghouse:</u> Mfr: Torit Model: TD-162 Efficiency: 99% acfm Exit Gas Temperature: 68°F (ambient)	<u>FP TOR Stack:</u> Stack Height: 33.92 feet, with cap Vertical discharge Stack Exit Diameter: 0.25 feet Modeled Flow Rate: 9.7E-03

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Table 4.3 EMISSION UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION

Emission Unit ID No.	Emissions Unit Description	Control Device Description (if applicable)	Emissions Discharge Point ID No. or Description
Flake Packaging Drum Negative Air Baghouse	Process Feed Material: Potato Flakes Rated Capacity: 18,000 lb/hr Process Equipment or Air Pollution Control Equipment: Process equipment (product recovery)	<u>Primary: Cyclone:</u> Mfr: Idaho Steel Efficiency: 90% <u>Secondary: Baghouse:</u> Mfr: Nol-Tech Systems Model: 238 Efficiency: 99%	<u>FP_BH Stack:</u> Stack Height: 37.42 feet Stack Exit Diameter: 1.53 feet Exhaust Flow Rate: 12,000 acfm Exit Gas Temperature: 68°F (ambient)
Tote Dump Station Cyclone	Manufacturer: Custom-made Feed Material: Agglomerated potato flake Process Throughput: 1,750 lb/hr Process Equipment or Air Pollution Control Equipment: Process equipment (product recovery)	No Control Device	<u>CYCLONE Stack:</u> Stack Height: 44.08 feet, Non-vertical discharge Modeled: Stack Exit Diameter: 0.0033 feet Exhaust Flow Rate: 1.7E-06 acfm Exit Gas Temperature: 68°F (ambient)

^a Exit diameters and flow rates given in application are the modeled values, which used DEQ guidance default velocities and diameters to account for the presence of a cap (for the Drum Dryers) and modeling the vertical National Dryer stacks as horizontal releases. Actual stack diameters shown were calculated from stack areas given in the December 23, 2004 source test report.

4.4 Insignificant Emissions Units Based on Size or Production Rate

No emissions unit or activity subject to an applicable requirement may qualify as an insignificant emissions unit or activity. As required by IDAPA 58.01.01.317.01.b, insignificant emissions units (IEU's) based on size or production rate must be listed in the permit application. The facility listed 33 sources identified as insignificant activities subject to IDAPA 58.01.01.317. Table 6.1 in the Tier I permit list these sources and the regulatory justification for each insignificant emission unit listed in Table 10.0-1 of the application. Since the Tier I application's submittal, the four Rensor heaters are no longer operational and have been removed from Table 6.1 of the Tier I permit.

The 30,000 gallon storage tanks were added to the insignificant list. These tanks were at one time subject to 40 CFR part 60 subpart Kb, but a change in the regulation made the tanks no longer subject to 40 CFR part 60 subpart Kb. Thus the tanks became insignificant sources and listed in Table 6.1.

4.5 Non-applicable Requirements for Which a Permit Shield is Requested

This section of the permit lists the regulations for which the facility has requested, and DEQ proposes to grant, a permit shield pursuant to IDAPA 58.01.01.325. The findings on which this shield is based are presented below:

Idahoan did not require a permit shield for any non-applicable requirements.

4.6 Emissions Inventory

Table 4.4 summarizes the emissions inventory for this major facility. All values are expressed in units of tons-per-year and represent the facility's potential to emit. Potential to emit is defined as the maximum capacity of a facility or stationary source to emit an air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored or processed shall be treated as part of its design if the limitation or the effect it would have on emissions is state or federally enforceable.

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Listed below Table 4.4 are the references for the emission factors used to estimate the emissions. The documentation provided by the applicant for the emissions inventory and emission factors is provided as Appendix B of this statement of basis.

Table 4.4 EMISSIONS INVENTORY – POTENTIAL TO EMIT (T/yr)

Emissions Unit Description	PM ₁₀ ^a	NO _x	SO ₂	CO	VOC
Boiler #1	19.71	214.30	100.22	22.80	5.84
Boiler #2	0.21	2.79	0.02	2.35	0.15
Cyclone	0.57				
Drum Dryer #1	8.54		0.05		
Drum Dryer #2	8.54		0.05		
Drum Dryer #3	8.54		0.05		
Drum Dryer #4	8.54		0.05		
Drum Dryer #5	8.54		0.05		
Drum Dryer #6	8.54		0.05		
Drum Dryer #7	8.54		0.05		
Drum Dryer #8	8.54		0.05		
Drum Dryer #9	8.54		0.05		
Drum Dryer #10	8.54		0.05		
Drum Dryer #11	8.54		0.05		
Drum Dryer #12	8.54		0.05		
National Dryer Process Emissions	7.49		0.35		
Fluidized Bed Dryer	15.48	2.94	0.38	1.66	0.11
Flake Packaging Bulk Line	0.53				
Flake Packaging Line	0.35				
Flake Packaging Torit Line	0.35				
Flake Packaging Drum Negative Air Baghouse	0.79				
National Dryer A1	0.12	2.39	0.26	1.32	0.09
National Dryer A2	0.12	2.39	0.26	1.32	0.09
National Dryer B	0.12	2.39	0.26	1.32	0.09
National Dryer C	0.12	2.39	0.26	1.32	0.09
Propane Heaters	0.12	3.00	0.26	1.32	0.09
TOTAL EMISSIONS	148.56	232.59	102.87	33.41	6.55

a. The PM₁₀ emissions are uncontrolled emissions without the scrubber. It should also be noted that the National Dryer PM₁₀ emissions shown are from propane combustion only. These numbers should include an additional 2.02 T/yr of PM₁₀.

Emission factors for each of the pollutants shown came from the following sources. Boiler No. 1 using #6 residual oil, all emission factors were obtained via AP-42 Tables 1.3-1 through 1.3-3. Boiler No. 1 using propane, all emission factors were obtained via AP-42 Table 1.5-1. Boiler No. 2 using natural gas emission factors were obtained via AP-42 Tables 1.4-1 and 1.4-2. Emission factors for the cyclone were obtained via AP-42 Tables 9.9-1 and 9.9-2. All emission factors for the 12 drum dryers were obtained during a December 23, 2004 source test. DEQ confirmed the emission factors in an April 7, 2005 letter to Idahoan (formerly Blaine Larsen Farms). The fluidized bed dryer emission factors were obtained via AP-42 Tables 1.4-1, 1.4-2 and 1.5-1. Flake packaging and National dryer PM emission factors are also from the April 7, 2005 letter from DEQ. Other criteria pollutant emission factors for National dryer A1, A2, B and C using operating on propane gas were obtained via AP-42 Table 1.5-1. When operating with natural gas AP-42 Tables 1.4-1 and 1.4-2 were used.

For each modification project after June 30, 1995, the TAP rules apply only to the increase in toxic air pollutants (TAPs) emissions associated with that particular modification. The increase in the heat input capacity for Boiler No. 1 and the installation of a third fuel storage tank resulted in incremental increases in TAP emissions.

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The applicant calculated the facility-wide uncontrolled TAP emissions and compared these totals to the applicable screening emission levels (EL). Modeling was conducted for all TAPs that exceeded the applicable EL, which are summarized in Table 4.6. The facility-wide emissions of hazardous air pollutants (HAPs) are also shown in Table 4.6. Detailed emission estimates for the total uncontrolled emissions of TAPs and HAPs are included in Appendix B.

Table 4.5 SUMMARY OF FACILITY-WIDE TAPs INVENTORY

	Emission Rate (lb/hr)	EL (lb/hr)	HAPs Emissions (tons/yr)
Noncarcinogenic TAPs			
Cobalt	6.27E-03	3.3E-03	
Dichlorobenzene			2.70E-05
Ethyl benzene			2.9E-04
Hexane			4.05E-02
Mercury			1.29E-03
Methyl chloroform			1.08E-03
Naphthalene			5.21E-03
Phosphorus	9.85E-03	7.0E-03	4.31E-02
Selenium			6.31E-03
Toluene			2.86E-02
Vanadium	3.33E-02	3.0E-03	
Xylenes			4.97E-04
Carcinogenic TAPs/HAPs			
Arsenic	1.38E-03	1.5E-06	6.04E-03
Benzene	---	---	1.18E-03
Beryllium	2.88E-04	2.8E-05	1.26E-03
Cadmium	3.20E-04	3.7E-06	1.37E-03
Chromium VI	2.58E-04	5.6E-07	1.13E-03
Formaldehyde	3.65E-02	5.1E-04	1.58E-01
Nickel	6.24E-05	2.7E-05	2.66E-04
POM (7-PAH Group)	1.22E-05	2.0E-06	1.98E-06
Total HAPs			0.296

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Location:	Dubois, Idaho	Facility ID No.	033-00002

5. EMISSIONS LIMITS AND MRRR

This section contains the applicable requirements for this major facility. Where applicable, monitoring, recordkeeping, and reporting requirements (MRRR) follow the applicable requirement and state how compliance with the applicable requirement is to be demonstrated.

This section is divided into several subsections. The first subsection lists the requirements that apply facility wide. The next subsection lists the emissions units- and emissions activities-specific applicable requirements. The final subsection contains the general provisions that apply to all major facilities subject to Idaho DEQ's Tier I operating permit requirements.

This section contains the following subsections:

- Facility-Wide Conditions;
- Boiler No. 1 Emissions Limits;
- Boiler No. 2 Emissions Limits;
- Dryer Processes and Material Transfer Systems Emissions Limits; and
- Tier I Operating Permit General Provisions.

MRRR

Immediately following each applicable requirement (permit condition) is the periodic monitoring regime upon which compliance with the underlying applicable requirement is demonstrated. A periodic monitoring regime consists of monitoring, recordkeeping and reporting requirements for each applicable requirement. If an applicable requirement does not include sufficient monitoring, recordkeeping, and reporting to satisfy IDAPA 58.01.01.322.06, 07, and 08, then the permit must establish adequate monitoring, recordkeeping, and reporting sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the permit. This is known as gap filling.

The discussion of each permit condition includes the legal and factual basis for the permit condition. If a permit condition was changed due to facility draft or public comments, describe why and how the condition was changed. These comments and responses (if any) can be found in Appendix C.

State Enforceability

An applicable requirement that is not required by the federal CAA and has not been approved by EPA as a SIP-approved requirement is identified as a "State-only" requirement and is enforceable only under state law. State-only requirements are not enforceable by the EPA or citizens under the CAA. State-only requirements are identified in the permit within the citation of the legal authority for the permit condition.

Federal Enforceability

Unless identified as "State-only," all applicable requirements, including MRRR, are state and federally enforceable. It should be noted that while a violation of a MRRR is a violation of the permit, it is not necessarily a violation of the underlying applicable requirement (e.g. emissions limit).

To minimize the length of this document, the MRRR for the facility-wide permit conditions has been paraphrased. Refer to the permit for the complete requirement.

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5.1 Facility-wide Conditions

Permit Condition 2.1 – Fugitive Dust

All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651.

[IDAPA 58.01.01.650-651, 3/30/07]

MRRR (Permit Conditions 2.2 through 2.4)

- Monitor and maintain records of the frequency and the methods used to control fugitive dust emissions;
- Maintain records of all fugitive dust complaints received and the corrective action taken in response to the complaint;
- Conduct a monthly facility-wide inspection of all sources of fugitive emissions. If any of the sources of fugitive dust are not being reasonably controlled, corrective action is required.
- Records of each fugitive dust inspection and corrective action taken are to be maintained at the permitted facility.

[IDAPA 58.01.01.322.06, 07, 08, 4/5/2000]

Permit Condition 2.5 – Odors

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.

[IDAPA 58.01.01.775-776 (State-only), 5/1/94]

MRRR (Permit Condition 2.6)

- Maintain records of all odor complaints received and the corrective action taken in response to the complaint;
- Take appropriate corrective action if the complaint has merit, and log the date and corrective action taken.

[IDAPA 58.01.01.322.06, 07 (State-only), 5/1/94]

Permit Condition 2.7 – Visible Emissions

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, nitrogen oxides, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.

[IDAPA 58.01.01.625, 4/2/08T]

MRRR (Permit Condition 2.8)

- Conduct a monthly facility-wide inspection during daylight hours and under normal operating conditions for the purposes of observing points of visible emissions from all emissions units subject to the visible emissions standards.
- Sources that are monitored using a continuous opacity monitoring system (COMS) are not required to comply with this permit condition.
 - Each inspection shall be conducted as follows:
 - Initial see/no see evaluation for each potential source of visible emissions. If any visible emissions are present from any point of emission, the permittee shall either:

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- Take appropriate corrective action as expeditiously as practicable to eliminate the visible emissions, and conduct another see/no see evaluation within 24 hours. If the visible emissions are not eliminated, the permittee shall comply with b).

OR

- Perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. If the measured opacity is greater than 20% for the time period specified in Section 625, the permittee shall take corrective action and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136.
- Records of each visible emission inspection and each opacity test and corrective action taken are to be maintained at the permitted facility.
[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

Permit Condition 2.9 – Excess Emissions

The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions. The provisions of IDAPA 58.01.01.130-136 shall govern in the event of conflicts between Permit Condition 2.9 and the regulations of IDAPA 58.01.01.130-136.

MRRR

Monitoring, recordkeeping and reporting requirements for excess emissions are provided in Sections 131 through 136.

Permit Condition 2.10 – Performance Testing

If performance testing is required, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test or shorter time period as provided in a permit, order, consent decree, or by DEQ approval. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests such testing not be performed on weekends or state holidays.

All 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, prior to conducting any performance test, the permittee is encouraged to submit in writing to DEQ, at least 30 days in advance, the following for approval:

- The type of method to be used
- Any extenuating or unusual circumstances regarding the proposed test
- The proposed schedule for conducting and reporting the test

The permittee shall submit a compliance test report for the respective test to DEQ within 30 days following the date in which a compliance test required by this permit is concluded. The compliance test report shall include all process operating data collected during the test period as well as the test results, raw test data, and associated documentation, including any approved test protocol.

The proposed test date(s), test date rescheduling notice(s), compliance test report, and all other correspondence shall be sent to the following address:

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

[IDAPA 58.01.01.157, 4/5/00; IDAPA 58.01.01.322.06, 08.a, 09, 5/1/94]

MRRR

No monitoring is required for this facility-wide condition. As with all permit conditions, Idahoan Foods, LLC must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

However, if performance testing is required, it is to be conducted in accordance with IDAPA 58.01.01.157, including any and all monitoring, recordkeeping and reporting requirements. Emissions-unit specific MRRR will be listed within the permit condition requiring performance testing permit condition.

Permit Condition 2.11 – Monitoring and Recordkeeping

The permittee shall maintain sufficient records to assure compliance with all of the terms and conditions of this operating 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, 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 58.01.01.322.07, 5/1/94]

MRRR

No monitoring is required for this facility-wide condition. As with all permit conditions, Idahoan must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 2.12 – Reports and Certifications

All periodic reports and certifications required by this permit shall be submitted to DEQ within 30 days of the end of each specified reporting period. Excess emissions reports and notifications shall be submitted in accordance with IDAPA 58.01.01.130-136. Reports, certifications, and notifications shall be submitted to:

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

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The periodic compliance certification required by General Provision 21 shall also be submitted within 30 days of the end of the specified reporting period to:

EPA Region 10
Air Operating Permits, OAQ-107
1200 Sixth Ave.
Seattle, WA 98101

[IDAPA 58.01.01.322.08, 11, 5/1/94]

MRRR

No monitoring is required for this facility-wide condition. As with all permit conditions, Idahoan must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 2.13 – Fuel Burning Equipment PM Standards

The permittee shall not discharge PM to the atmosphere from any fuel-burning equipment in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas, 0.050 gr/dscf of effluent gas corrected to 3% oxygen by volume for liquid, 0.050 gr/dscf of effluent gas corrected to 8% oxygen by volume for coal, and 0.080 gr/dscf of effluent gas corrected to 8% oxygen by volume for wood products.

[IDAPA 58.01.01.676-677, 5/1/94]

MRRR

No monitoring is required for this facility-wide condition. As with all permit conditions, Idahoan must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 2.14 – Distillate Fuel Oil Sulfur Content Limits

The permittee shall not sell, distribute, use, or make available for use any distillate fuel oil containing more than the following percentages of sulfur:

- ASTM Grade 1 fuel oil - 0.3% by weight.
- ASTM Grade 2 fuel oil - 0.5% by weight.
- Residual fuel oil (ASTM Grades 4, 5, and 6) – 1.75% by weight.
- Biodiesel (ASTM D 6751) – 1.75% by weight.

[IDAPA 58.01.01.728, 5/1/94]

MRRR – Permit Condition 2.14

The permittee shall maintain documentation of supplier verification of distillate fuel oil/residual fuel oil/biodiesel sulfur content on an as-received basis.

[IDAPA 58.01.01.322.06, 5/1/94]

Permit Condition 2.15 – Open Burning

The permittee shall comply with the *Rules for Control of Open Burning*, IDAPA 58.01.01.600-623.

[IDAPA 58.01.01.600-623, 4/2/08T]

MRRR

No monitoring is required for this facility-wide condition. As with all permit conditions, Idahoan must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

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Permit Condition 2.16 – Renovation/Demolition

The permittee shall comply with all applicable portions of 40 CFR 61, Subpart M when conducting any renovation or demolition activities at the facility.

[40 CFR 61, Subpart M]

MRRR

No monitoring is required for this facility-wide condition. As with all permit conditions, Idahoan must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 2.17 – Regulated Substances for Accidental Release Prevention

(a)

An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, shall comply with the requirements of the Chemical Accident Prevention Provisions at 40 CFR 68 no later than the latest of the following dates:

- Three years after the date on which a regulated substance present above a threshold quantity is first listed under 40 CFR 68.130.
- The date on which a regulated substance is first present above a threshold quantity in a process.

[40 CFR 68.10 (a)]

(b)

This facility is subject to 40 CFR Part 68 and shall certify compliance with all requirements of 40 CFR Part 68, including the registration and submission of the RMP, as part of the annual compliance certification required by 40 CFR 70.6(c)(5).

[40 CFR 68.215(a)(2); IDAPA 58.01.01.322.11, 4/6/05; 40 CFR 68.215(a)(ii)]

MRRR

No monitoring is required for this facility-wide condition. As with all permit conditions, Idahoan must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 2.18 – Recycling and Emissions Reductions

The permittee shall comply with applicable standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, Recycling and Emissions Reduction.

[40 CFR 82, Subpart F]

MRRR

No monitoring is required for this facility-wide condition. As with all permit conditions, Idahoan must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 2.19 – Control of Property within Ambient Air Boundary

The permittee shall maintain exclusive access control over all properties within the modeled ambient air boundary shown in Figure 2-2 of the facility's PTC/Tier II permit application received by DEQ on May 5, 2006, and as described in Exhibit A-1 of the Custom Farming Agreement executed between RDO Processing, LLC (now Idahoan Foods, LLC) and BLF Land, LLC, effective on January 18, 2006, as amended on February 25, 2006. Access controls shall include posting and maintaining No Trespassing signs at the boundaries.

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MRRR

No monitoring is required for this facility-wide condition. As with all permit conditions, Idahoan must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

Permit Condition 2.20 – Incorporation by Reference

For permit conditions referencing or cited in accordance with any document incorporated by reference (including permit conditions identified as NSPS or NESHAP), should there be any conflict between the requirements of the permit condition and the requirements of the document, the requirements of the document shall govern, including any amendments to that regulation.

MRRR

No monitoring is required for this facility-wide condition. As with all permit conditions, Idahoan must certify compliance with this condition annually, which includes making a reasonable inquiry to determine if this requirement was met during the reporting period.

5.2 Emissions Unit-specific Emissions Limits and MRRR

Boiler No. 1

Permit Condition 3.1 – 3.8

No changes were made to Boiler No. 1 emission limits set forth in PTC No. 2009.0026.

MRRR – (permit Condition 3.9 – 3.30)

Permit condition 3.16 was added to require CEMS operation for NO_x for all fuels combusted and CEMS operation for SO₂ when burning residual or distillate fuel oil, but not when burning very low sulfur fuel oil, propane or natural gas. Subsequent conditions were renumbered to reflect the addition.

Permit Condition 3.31

No changes were made to Boiler No. 1 NSPS 40 CFR 60 Subpart A compliance required by the permittee.

Permit Condition 3.32

Table 3.3 was updated to include more criteria defined in 40 CFR 60 subpart A. Subsection 60.4, addresses, was modified. Subsections 60.8, performance test, 60.14, modifications, 60.15, reconstruction all were added. Subsection 60.7 was separated into two parts. A, B, and F were isolated as standard notification and recordkeeping. A, C, D, and F were separated as notification and recordkeeping (CMS).

Boiler No. 2

Permit Condition 4.1

No changes were made to Boiler No. 2 emission limits set forth in PTC No. 2009.0026.

Permit Condition 4.2

As long as Boiler No. 2 is fired only by natural gas and propane, it complies with the grain loading standard. Therefore no changes to the emission limit as set forth in PTC No 2009.0026.

Permit Condition 4.3

No changes were made to Boiler No. 2 MRRR set forth in PTC No. 2009.0026.

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Dryer Processes and Material Transfer Systems

Permit Condition 5.1 – 5.2

No changes were made to dryer processes and material transfer systems emission limits set forth in PTC No. 2009.0026.

MRRR

No changes were made to the permit and compliance will be demonstrated with throughput monitoring.

Permit Condition 5.3 – 5.6

No changes were made to the dryer processes and material transfer systems emission limits set forth in PTC No. 2009.0026.

MRRR

Compliance will be demonstrated through monitoring throughput, pressure drops and types of gas combusted.

Permit Condition 5.7 - 5.8

No changes were made regarding dryer processes and material transfer systems as set forth in PTC No. 2009.0026.

MRRR

Compliance will be demonstrated through monitoring throughput, pressure drops and types of gas combusted.

Permit Condition 5.9

No changes were made regarding baghouse O&M manual as set forth in PTC No. 2009.0026.

MRRR

The statement of compliance with General provision #2 was removed because the current General Provision #2 does not discuss Baghouse O&M manuals.

5.3 General Provisions

Unless expressly stated, there are no MRRR for the general provisions.

General Provision 1 – General Compliance, Duty to Comply

The permittee must comply with the terms and conditions of the permit.

[IDAPA 58.01.01.322.15.a, 5/1/94; 40 CFR 70.6(a)(6)(i)]

General Provision 2 – General Compliance, Need to Halt or Reduce Activity Not a Defense

The permittee cannot use the fact that it would have been necessary to halt or reduce an activity as a defense in an enforcement action.

[IDAPA 58.01.01.322.15.b, 5/1/94; 40 CFR 70.6(a)(6)(ii)]

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General Provision 3 – General Compliance, Duty to Supplement or Correct Application

The permittee must promptly submit such supplementary facts or corrected information upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application. The permittee must also provide information as necessary to address any new requirements that become applicable after the date a complete application has been filed but prior to the release of a draft permit.

[IDAPA 58.01.01.315.01, 5/1/94; 40 CFR 70.5(b)]

General Provision 4 – Reopening, Additional Requirements, Material Mistakes, Etc.

This term lists the instances when the permit must be reopened and revised, including times when additional requirements become applicable, when the permit contains mistakes, or when revision or revocation is necessary to assure compliance with applicable requirements.

[IDAPA 58.01.01.322.15.c, 5/1/94; IDAPA 58.01.01.386, 3/19/99;
40 CFR 70.7(f)(1), (2); 40 CFR 70.6(a)(6)(iii)]

General Provision 5 – Reopening, Permitting Actions

This term discusses modification, revocation, reopening, and/or reissuance of the permit for cause. If Idahoan files a request to modify, revoke, reissue, or terminate the permit, the request does not stay any permit condition, nor does notification of planned changes or anticipated noncompliance.

[IDAPA 58.01.01.322.15.d, 5/1/94; 40 CFR 70.6(a)(6)(iii)]

General Provision 6 – Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege.

[IDAPA 58.01.01.322.15.e, 5/1/94; 40 CFR 70.6(a)(6)(iv)]

General Provision 7 – Information Requests

The permittee must furnish, within a reasonable time to DEQ, any information, including records required by the permit, that is requested in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.

[Idaho Code §39-108; IDAPA 58.01.01.122, 4/5/00; IDAPA 58.01.01.322.15.f, 4/5/00;
40 CFR 70.6(a)(6)(v)]

General Provision 8 – Information Requests, Confidential Business Information

Upon request, the permittee must furnish to DEQ copies of records required to be kept by this permit. For information claimed to be confidential, the permittee may furnish such records along with a claim of confidentiality in accordance with Idaho Code §9-342A and applicable implementing regulations including IDAPA 58.01.01.128.

[IDAPA 58.01.01.322.15.g, 5/1/94; IDAPA 58.01.01.128, 4/5/00; 40 CFR 70.6(a)(6)(v)]

General Provision 9 - Severability

If any provision of the permit is held to be invalid, all unaffected provisions of the permit will remain in effect and enforceable.

[IDAPA 58.01.01.322.15.h, 5/1/94; 40 CFR 70.6(a)(5)]

General Provision 10 – Changes Requiring Permit Revision or Notice

The permittee may not commence construction or modification of any stationary source, facility, major facility, or major modification without first obtaining all necessary permits to construct or an approval under IDAPA 58.01.01.213, or complying with IDAPA 58.01.01.220 through 223. The permittee must comply with IDAPA 58.01.01.380 through 386 as applicable.

[IDAPA 58.01.01.200-223, 4/2/08; IDAPA 58.01.01.322.15.i, 3/19/99; IDAPA 58.01.01.380-386, 7/1/02;
40 CFR 70.4(b)(12), (14), (15), and 70.7(d), (e)]

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General Provision 11 – Changes Requiring Permit Revision or Notice

Changes that are not addressed or prohibited by the Tier I operating permit require a Tier I operating permit revision if such changes are subject to any requirement under Title IV of the CAA, 42 U.S.C. Section 7651 through 7651c, or are modifications under Title I of the CAA, 42 U.S.C. Section 7401 through 7515. Administrative amendments (IDAPA 58.01.01.381), minor permit modifications (IDAPA 58.01.01.383), and significant permit modifications (IDAPA 58.01.01.382) require a revision to the Tier I operating permit. IDAPA 58.01.01.502(b)(10) changes are authorized in accordance with IDAPA 58.01.01.384. Off-permit changes and required notice are authorized in accordance with IDAPA 58.01.01.385.

[IDAPA 58.01.01.381-385, 7/1/02; IDAPA 58.01.01.209.05, 4/11/06;
40 CFR 70.4(b)(14) and (15)]

General Provisions 12 and 13 – Federal and State Enforceability

All permit conditions are federally enforceable unless specified in the permit as a state or local only requirement. State and local only requirements are not required under the CAA and are not enforceable by EPA or by citizens.

[IDAPA 58.01.01.322.15.j, 5/1/94; IDAPA 58.01.01.322.15.k, 3/23/98;
Idaho Code §39-108; 40 CFR 70.6(b)(1) and (2)]

General Provision 14 – Inspection and Entry

Upon presentation of credentials, Idahoan Foods, LLC shall allow DEQ or an authorized representative of DEQ to do the following:

- a. Enter upon the permittee’s premises where a Tier I 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; IDAPA 58.01.01.322.15.l, 5/1/94; 40 CFR 70.6(c)(2)]

General Provision 15 – New Requirements During Permit Term

The permittee must continue to comply with all applicable requirements and must comply with new requirements on a timely basis.

[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.10.a.ii, 5/1/94;
40 CFR 70.6(c)(3) citing 70.5(c)(8)]

General Provision 16 - Fees

The owner or operator of a Tier I source shall pay annual registration fees to DEQ in accordance with IDAPA 58.01.01.387 through IDAPA 58.01.01.397.

[IDAPA 58.01.01.387, 4/2/03; 40 CFR 70.6(a)(7)]

General Provision 17 – Certification

All documents submitted to DEQ shall be certified in accordance with IDAPA 58.01.01.123 and comply with IDAPA 58.01.01.124.

[IDAPA 58.01.01.322.15.o, 5/1/94; 40 CFR 70.6(a)(3)(iii)(A); 40 CFR 70.5(d)]

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General Provision 18 - Renewal

a. Idahoan shall submit an application to DEQ for a renewal of this permit at least six months before, but no earlier than 18 months before, the expiration date of this operating permit. To ensure that the term of the operating permit does not expire before the permit is renewed, the owner or operator is encouraged to submit a renewal application nine months prior to the date of expiration.

[IDAPA 58.01.01.313.03, 4/5/00; 40 CFR 70.5(a)(1)(iii)]

b. If a timely and complete application for a Tier I operating permit renewal is submitted, but DEQ fails to issue or deny the renewal permit before the end of the term of this permit, then all the terms and conditions of this permit including any permit shield that may have been granted pursuant to IDAPA 58.01.01.325 shall remain in effect until the renewal permit has been issued or denied.

[IDAPA 58.01.01.322.15.p, 5/1/94; 40 CFR 70.7(b)]

General Provision 19 – Permit Shield

Compliance with the terms and conditions of the Tier I operating permit, including those applicable to all alternative operating scenarios and trading scenarios, shall be deemed compliance with any applicable requirements as of the date of permit issuance, provided that:

- a. Such applicable requirements are included and are specifically identified in the Tier I operating permit; or
 - i. DEQ has determined that other requirements specifically identified are not applicable and all of the criteria set forth in IDAPA 58.01.01.325.01(b) have been met.
- b. The permit shield shall apply to permit revisions made in accordance with IDAPA 58.01.01.381.04 (administrative amendments incorporating the terms of a permit to construct), IDAPA 58.01.01.382.04 (significant modifications), and IDAPA 58.01.01.384.03 (trading under an emissions cap).
- c. Nothing in this permit shall alter or affect the following:
 - i. Any administrative authority or judicial remedy available to prevent or terminate emergencies or imminent and substantial dangers;
 - ii. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - iii. The applicable requirements of the acid rain program, consistent with 42 U.S.C. Section 7651(g)(a); and
 - iv. The ability of EPA to obtain information from a source pursuant to Section 114 of the CAA; or the ability of DEQ to obtain information from a source pursuant to Idaho Code §39-108 and IDAPA 58.01.01.122.

[Idaho Code §39-108 and 112; IDAPA 58.01.01.122, 4/5/00;
IDAPA 58.01.01.322.15.m, 325.01, 5/1/94; IDAPA 58.01.01.325.02, 3/19/99;
IDAPA 58.01.01.381.04, 382.04, 383.05, 384.03, 385.03, 3/19/99; 40 CFR 70.6(f)]

General Provision 20 – Compliance Schedule and Progress Reports.

- a. For each applicable requirement for which the source is not in compliance, the permittee shall comply with the compliance schedule incorporated in this permit.
- b. For each applicable requirement that will become effective during the term of this permit and that provides a detailed compliance schedule, the permittee shall comply with such requirements in accordance with the detailed schedule.

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- c. For each applicable requirement that will become effective during the term of this permit that does not contain a more detailed schedule, the permittee shall meet such requirements on a timely basis.
- d. For each applicable requirement with which the permittee is in compliance, the permittee shall continue to comply with such requirements.

[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.9, 5/1/94; IDAPA 58.01.01.314.10, 4/5/00;
40 CFR 70.6(c)(3) and (4)]

General Provision 21 – Periodic Compliance Certification

Idahoan shall submit compliance certifications during the term of the permit for each emissions unit to DEQ and the EPA as follows:

- a. The compliance certifications for all emissions units shall be submitted annually from January 1st To December 31st or more frequently if specified by the underlying applicable requirement or elsewhere in this permit.
- b. The initial compliance certification for each emissions unit shall address all of the terms and conditions contained in the Tier I operating permit that are applicable to such emissions unit including emissions limitations, standards, and work practices;
- c. The compliance certification shall be in an itemized form providing the following information (provided that the identification of applicable information may cross-reference the permit or previous reports as applicable):
 - i. The identification of each term or condition of the Tier I operating permit that is the basis of the certification;
 - ii. The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period. Such methods and other means shall include, at a minimum, the methods and means required under Subsections 322.06, 322.07, and 322.08;
 - iii. The status of compliance with the terms and conditions of the Tier I operating permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in Subsection 322.11.c.ii. above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred; and
 - iv. Such information as the Department may require to determine the compliance status of the emissions unit.
- d. All original compliance certifications shall be submitted to DEQ and a copy of all compliance certifications shall be submitted to the EPA.

[IDAPA 58.01.01.322.11, 4/6/05; 40 CFR 70.6(c)(5)(iii) as amended,
62 Fed. Reg. 54900, 54946 (10/22/97); 40 CFR 70.6(c)(5)(iv)]

General Provision 22 – False Statements

Idahoan may not 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]

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General Provision 23 – No Tampering

Idahoan may not 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]

General Provision 24 – Semiannual Monitoring Reports.

In addition to all applicable reporting requirements identified in this permit, Idahoan shall submit reports of any required monitoring at least every six months. Idahoan semiannual reporting periods shall be from January 1st to June 30th and July 1st to December 31st. All instances of deviations from this operating permit’s requirements must be clearly identified in the report. The semiannual reports shall be submitted to DEQ within 30 days of the end of the specified reporting period.

[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.322.08.c, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

General Provision 25 – Reporting Deviations and Excess Emissions

Each and every applicable requirement, including MRRR, is subject to prompt deviation reporting. Deviations due to excess emissions must be reported in accordance Sections 130-136. All instances of deviation from Tier I operating permit requirements must be included in the deviation reports. The reports must describe the probable cause of the deviation and any corrective action or preventative measures taken. Deviation reports must be submitted at least every six months unless the permit specifies a different time period as required by IDAPA 58.01.01.322.08.c. Examples of deviations include, but are not limited to, the following:

- Any situation in which an emissions unit fails to meet a permit term or condition
- Emission control device does not meet a required operating condition
- Observations or collected data that demonstrate noncompliance with an emissions standard
- Failure to comply with a permit term that requires a report

[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.135, 4/11/06; 40 CFR 70.6(a)(3)(iii)]

General Provision 26 – Permit Revision Not Required, Emissions Trading

No permit revision will be required, under any approved, economic incentives, marketable permits, emissions trading, and other similar programs or processes, for changes that are provided for in the permit.

[IDAPA 58.01.01.322.05.b, 4/5/00; 40 CFR 70.6(a)(8)]

General Provision 27 - Emergency

In accordance with IDAPA 58.01.01.332, an “emergency” as defined in IDAPA 58.01.01.008, constitutes an affirmative defense to an action brought for noncompliance with such technology-based emissions limitation if the conditions of IDAPA 58.01.01.332.02 are met.

[IDAPA 58.01.01.332.01, 4/5/00; 40 CFR 70.6(g)]

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6. REGULATORY REVIEW

6.1 Attainment Designation (40 CFR 81.313)

The facility is located in Clark County which is designated as attainment or unclassifiable for PM₁₀, PM_{2.5}, CO, NO₂, SO_x, and Ozone. Reference 40 CFR 81.313.

6.2 Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70)

This facility is classified as a major facility in accordance with IDAPA 58.01.01.008.10.c, because the facility emits or has the potential to emit a regulated air pollutant in amounts greater than or equal to 100 tons per year. Idahoan requires a Tier I operating permit because of the ability to emit more than 100 tons-per-year of the following criteria pollutants: NO_x, SO₂, PM, and PM₁₀. This facility is not a designated facility as defined by IDAPA 58.01.01.006.30. This facility is subject to federal NSPS requirements in accordance with 40 CFR 60.

6.3 PSD Classification (40 CFR 52.21)

This facility is not a major facility for the purposes of the NSR/PSD program as defined under IDAPA 58.01.01.205.01 [40 CFR 52.21(b)(1)(a), (b), and (c)]. The facility is not a designated facility, and the potential to emit for any regulated NSR source pollutant is limited to less than 250 tons per year thus the facility is not subject to PSD.

6.4 NSPS Applicability (40 CFR 60)

40 CFR 60 Subpart Db NSPS for Industrial, Commercial, and Institutional Steam Generating Units

40 CFR 60.40b(a), Applicability.

Boiler No. 1 was described as being new when installed in 1996, therefore, for purposes of assessing applicability of this subpart the boiler was constructed in 1996. When installed, the rated heat input capacity for Boiler No. 1 was 144 MMBtu/hr. Permits T2-030514, issued June 2, 2004, and P-040524, issued March 7, 2005, reflected that Boiler No. 1 was an “affected facility” under Subpart Db, because it was a steam generating unit that commenced construction, modification, or reconstruction after June 19, 1984, and had a heat input capacity from fuels combusted in the steam generating unit of greater than 29 MW (100 MMBtu/hr).

In 2005, the burner was replaced with a new Todd® burner with a rated heat input capacity less than 100 MMBtu/hr when burning either ASTM No. 6 residual fuel oil or propane. Based on test results using the new burner with a nameplate rating of 99 MMBtu/hr, EPA approved de-rating this boiler so that the unit was subject to the requirements of 40 CFR 60 Subpart Dc rather than Subpart Db. Subpart Dc requirements were imposed on the modified boiler through a Consent Order issued February 17, 2006, for Case No. E-060001.

Under permitting action P-2007.0017, Boiler No. 1 was rerated to 150 MMBtu/hr by replacing the Todd® burner with a burner with a nameplate rating of 150 MMBtu/hr. With this change, Boiler No. 1 was again subject to the requirements of 40 CFR 60 Subpart Db.

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60.41b, Definitions.

Boiler No. 1 was modified after February 28, 2005, so *very low sulfur oil* is defined as oil that contains no more than 0.3 weight percent sulfur, or that, when combusted without sulfur dioxide emission control, has a sulfur dioxide emission rate equal to or less than 140 ng/J (0.32 lb/MMBtu) heat input.

60.42b, Standard for Sulfur Dioxide.

Paragraph 60.42b(a). This SO₂ standard applies only to combustion of coal or oil. This standard does not apply when burning natural gas or propane.

Percent reduction requirements and an emission limit for SO₂ are specified in 60.42b(a), except as provided in paragraphs (b), (c), (d), (j), or (k).

Paragraph 60.42b(a) limits SO₂ emissions to no more than 87 nanograms per Joule (ng/J) (0.20 lb/MMBtu) or 10 percent of the potential SO₂ emission rate (a 90 percent reduction) and the emission limit determined according to a specified formula. Since coal is not used in this boiler, the emission limit equation in 60.42b(a) reduces to simply:

$$E_s = (K_b * H_b) / H_b = K_b = 340 \text{ ng/J (0.80 lb/MMBtu)}.$$

Preconstruction compliance with the 90 percent reduction requirement is demonstrated based on the scrubber manufacturer guarantee of a minimum 92% SO₂ removal efficiency. Compliance with the 0.80 lb/MMBtu emission limit is demonstrated based on the scrubber manufacturer guarantee of 0.2 lb/MMBtu heat input, and based on emissions estimates provided in the permit application:

$$(22.88 \text{ lb/hr SO}_2 \text{ emissions with scrubber}) / (150 \text{ MMBtu/hr Heat Input Capacity}) = 0.15 \text{ lb/MMBtu}$$

Paragraphs 60.42b(b), (c), and (d) do not apply. Boiler No. 1 fuels and operations do not meet the criteria in these paragraphs.

Paragraph 60.42b(e) applies, which requires that compliance with the emission limits, fuel oil sulfur limits, and/or percent reduction requirements for SO₂ emissions be determined on a 30-day rolling average basis.

Paragraph 60.42b(f) does not apply because the annual capacity factor for oil for this boiler is not limited to 10 percent or less, and boiler fuels are not restricted to only very low sulfur fuel oil.

Paragraph 60.42b(g) applies, which requires that the SO₂ emission limits and percent reduction requirements apply at all times, including periods of startup, shutdown, and malfunction.

Paragraph 60.42b(h) does not apply because Boiler No. 1 fuels are not pretreated.

Paragraph 60.42b(i) applies, which allows the use of *very low sulfur oil* (maximum sulfur dioxide emission rate equal to or less than 140 ng/J (0.32 lb/MMBtu) heat input) or natural gas when the SO₂ control system is not being operated because of malfunction or maintenance of the SO₂ control system.

Paragraph 60.42b(j) applies only when only very low sulfur oil is burned. During these periods, percent reduction requirements are not applicable, and compliance is demonstrated by (1) following the performance testing procedures as described in 60.45b(c) or 60.45b(d), and following the monitoring procedures as described in 60.47b(a) or 60.47b(b) to determine the sulfur dioxide emission rate or fuel oil sulfur content; or (2) maintaining fuel receipts as described in 60.49b(r).

Paragraph 60.42b(k) does not apply because the affected facility was not constructed or reconstructed after February 28, 2005. Modification after this date does not trigger requirements under paragraph (k). However, in supplemental application materials received by DEQ on July 13, 2006, the permittee

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committed to meet the 0.2 lb/MMBtu (87 ng/J) emission limit or the 92% reduction and 1.2 lb/MMBtu emission limit specified in paragraph (k).

60.43b, Standard for Particulate Matter.

Paragraphs 60.43b(a), (b), (c), (d), and (e) do not apply because Boiler No. 1 does not

- (a) Combust coal or mixtures of coal,
- (b) Use a conventional or emerging technology to reduce SO₂ emissions,
- (c) Combust wood,
- (d) Combust municipal-type solid wastes, or
- (e) Combust coal, wood, or municipal-type solid wastes.

Paragraph 60.43b(f), the opacity standard, applies because Boiler No. 1 combusts oil. On and after the date on which the initial performance test is completed or is required to be completed under §60.8, whichever date comes first, emissions from the boiler shall not exceed 20% opacity (six-minute average), except for one six-minute period per hour of not more than 27% opacity.

Paragraph 60.43b(g) applies to all facilities subject to the opacity standard. This opacity standard applies at all times, except during periods of startup, shutdown, and malfunction.

Paragraph 60.43b(h)(1) applies because Boiler No. 1 is an affected facility that commenced [construction, reconstruction, or] modification after February 28, 2005, and combusts oil, [or] gas. On or after the date on which the performance test required to be conducted under §60.8 is completed, PM emissions shall not exceed 13 ng/J (0.030 lb/MMBtu) heat input.

As an alternative to meeting 60.43b(h)(1), the owner or operator of an affected facility for which modification commenced after February 28, 2005, may elect to meet paragraph 60.43b(h)(2), which states that on or after the date on which the performance test required to be conducted under §60.8 is completed, PM emissions shall be limited to no more than 22 ng/J (0.051 lb/MMBtu) heat input from the combustion of oil or gas, and 0.2 percent of the combustion concentration (99.8 percent reduction) when combusting oil or gas.

Paragraph 60.43b(h)(3) and (h)(4) do not apply because Boiler No. 1 does not combust wood.

Paragraph 60.43b(h)(5) applies. Boiler No. 1 is an affected facility that commenced [construction, reconstruction, or] modification after February 28, 2005. If Boiler No. 1 combusts only oil that contains no more than 0.3 weight percent sulfur or other liquid or gaseous fuels with potential SO₂ emission rates of 140 ng/J (0.32 lb/MMBtu) heat input or less, the boiler is not subject to the PM or opacity limits in this section.

60.44b, Standard for NO_x.

Paragraph 60.44b(a) applies to all units subject to Subpart Db, except as provided in paragraphs (k) and (l). [60.44b(k) and (l) do not apply.]

A high heat release rate is defined in 60.41b as a heat release rate greater than 70,000 Btu/hr-ft³.

Comments received from NAF-Dubois' predecessor (Blaine Larsen Farms) on March 9, 2004, described heat release rates for Boiler No. 1 as: 77,600 Btu/hr-ft³ for natural gas; 73,900 Btu/hr-ft³ for diesel fuel oil; and 73,400 Btu/hr-ft³ for #6 fuel oil. Information provided in supplemental application materials received on July 13, 2006, reconfirmed the heat release rate for No. 6 fuel oil.

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On this basis, Boiler No. 1 has a “high heat release rate” and is subject to NO_x limits of 86 ng/J (0.20 lb/MMBtu) for natural gas and distillate oil, and 170 ng/J (0.40 lb/MMBtu) for residual oil.

Paragraphs 60.44b(b), (c), (d), (e), (f), and (g) do not apply because Boiler No. 1 does not:

- (b) Simultaneously combust mixtures of coal, oil, or natural gas;
- (c) Simultaneously combust coal or oil with natural gas, wood, or municipal-type solid waste;
- (d) Simultaneously combust natural gas with wood, municipal-type solid waste, or other solid fuel;
- (e) Simultaneously combust coal, oil, or natural gas with byproduct/waste;
- (f) Combust byproduct/waste with natural gas or oil; or
- (g) Combust hazardous waste with natural gas or oil.

Paragraph 60.44b(h) applies to all affected facilities, including Boiler No. 1. The NO_x standards apply at all times, including periods of startup, shutdown, or malfunction.

Paragraph 60.44b(i) applies to Boiler No. 1 because the exception in 60.44b(j) does not apply. Compliance with the Subpart Db NO_x emission limits shall be determined on a 30-day rolling average.

Paragraph 60.44b(j) does not apply because Boiler No. 1 does not have an annual capacity factor of 10 percent or less for natural gas, distillate oil, or residual oil with a nitrogen content of 0.30 weight percent or less.

Paragraph 60.44b(k) does not apply because Boiler No. 1 does not meet the criteria in 60.44b(j).

Paragraph 60.44b(l) does not apply because Boiler No. 1 was not constructed or reconstructed after July 9, 1997.

60.45b. Compliance and Performance Test Methods and Procedures for SO₂.

Paragraph 60.45b(a) applies to all affected facilities, including Boiler No. 1. The SO₂ standards under 60.42b apply at all times.

Paragraph 60.45b(b) applies to all affected facilities, including Boiler No. 1. In conducting the performance tests required under Section 60.8, the owner or operator shall use the methods and procedures in Appendix A of this part or the methods and procedures as specified in this section, except as provided in 60.8(b), i.e., with prior EPA approval. Section 60.8(f)—which requires that the performance test consist of three separate runs using the applicable test method—does not apply to SO₂ compliance and performance testing. The 30-day notice required in 60.8(d) applies only to the initial performance test unless otherwise specified by EPA.

Paragraph 60.45b(c) applies to all affected facilities and requires that the owner or operator of an affected facility conduct performance tests to determine compliance with the percent of potential SO₂ emission rate (% P_s) and the SO₂ emission rate (E_s) pursuant to 60.42b following the procedures listed in 60.45b(c), except as provided under paragraphs 60.45b(d) and (k). [60.45b(d) does not apply.]

Paragraph 60.45b(c)(1) applies to all affected facilities and requires that the initial performance test be conducted over the first 30 consecutive operating days of the steam generating unit. Compliance with the SO₂ standards shall be determined using a 30-day average. The first operating day included in the initial performance test shall be scheduled within 30 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup of the facility.

Paragraph 60.45b(c)(2) applies if only coal or only oil is combusted in Boiler No. 1.

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Paragraphs 60.45b(c)(3) and (4) do not apply because Boiler No. 1 does not combust coal or oil with other fuels.

Paragraph 60.45b(c)(5) does not apply because Boiler No. 1 is not subject to 60.42b(d).

Paragraph 60.45b(d) does not apply because the annual capacity factor for oil for this boiler is not limited to 10 percent or less, and boiler fuels are not restricted to only very low sulfur fuel oil.

Paragraph 60.45b(e) does not apply because Boiler No. 1 is not subject to 60.42b(d)(1).

Paragraph 60.45b(f) applies to all affected facilities and requires that for the initial performance test required under Section 60.8, compliance with the SO₂ emission limits and percent reduction requirements under 60.42b is based on the average emission rates and the average percent reduction for SO₂ for the first 30 consecutive steam generating unit operating days, except as provided in paragraph 60.45b(d). [60.45b(d) does not apply.]

The initial performance test is the only test for which at least 30 days prior notice is required unless otherwise specified by the EPA. The initial performance test is to be scheduled so that the first steam generating unit operating day of the 30 successive steam generating unit operating days is completed within 30 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup of the facility.

The boiler load during the 30-day period does not have to be the maximum design load, but must be representative of future operating conditions and include at least one 24-hour period at full load.

Paragraph 60.45b(g) applies to all affected facilities, and requires that after the initial performance test, compliance with the SO₂ emission limits and percent reduction requirements under 60.42b is based on the average emission rates and the average percent reduction for SO₂ for 30 successive steam generating unit operating days, except as provided in 60.45b(d). [60.45b(d) does not apply.]

A separate performance test is completed at the end of each steam generating unit operating day after the initial performance test, and a new 30-day average emission rate and percent reduction for SO₂ are calculated to show compliance with the standard.

Paragraph 60.45b(h) applies to all affected facilities and requires that except during periods of malfunction or maintenance of the SO₂ control systems when *very low sulfur oil* is being combusted per 60.42b(i), the owner or operator shall use all valid SO₂ emissions data in calculating %P_s and E_{h_o} under 60.45b(c), whether or not the minimum emissions data requirements under 60.46b are achieved. All valid emissions data, including valid SO₂ emission data collected during periods of startup, shutdown and malfunction, shall be used in calculating %P_s and E_{h_o} pursuant to 60.45b(c).

Paragraph 60.45b(i) applies during periods of malfunction or maintenance on the SO₂ control systems when *very low sulfur oil* is being combusted per 60.42b(i). Emission data from these periods are not used to calculate %P_s and E_{h_o} under 60.42b(a), (b), or (c). [60.42b(b) and (c) do not apply.]

Paragraph 60.45b(j) applies when combusting only *very low sulfur oil*. The compliance and performance test methods and procedures contained in 60.45b do not apply if the owner or operator obtains fuel receipts as described in 60.49b(r).

Paragraph 60.45b(k) applies when combusting only oil that contains no more than 0.3 weight percent sulfur or fuels with potential sulfur dioxide emission rates of 140 ng/J (0.32 lb/MMBtu) heat input or less. Compliance may be demonstrated by maintaining records of fuel supplier certifications of the sulfur content of fuels burned.

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60.46b, Compliance and Performance Test Methods and Procedures for PM and NO_x.

Paragraph 60.46b(a) applies because Boiler No. 1 is subject to PM standards when burning oil or natural gas and is subject to opacity limits when burning oil. The PM and opacity limits under 60.43b apply at all times except during periods of startup, shutdown, or malfunction, as specified in 60.46b(i) and (j). NO_x emission standards apply at all times, including periods of startup, shutdown, and malfunction.

PM and Opacity Requirements

Applicable PM and opacity requirements include 60.46b(a), (b), and (d).

Paragraph 60.46b(b) applies to all facilities subject to Subpart Db, and requires performance testing to demonstrate compliance with 60.43b PM standards as specified in 60.46b(d), except as provided in (i) [when burning very low sulfur oil] and (j) [when operating a PM CEMS].

Paragraph 60.46b(d) applies, and requires that an initial PM and opacity performance test be conducted as required in 60.8, using the procedures and reference methods specified in 60.46b(d).

Paragraph 60.46b(i) applies when combusting only very low sulfur oil. Compliance with PM and opacity standards may be demonstrated by maintaining records of fuel supplier certifications of the sulfur content of fuels burned.

Paragraph 60.46b(j) applies, which allows the facility to install, calibrate, maintain, and operate a PM CEMS and record the PM CEMS output instead of conducting PM testing with Methods 5, 5B, or 17. If a PM CEMS is used, compliance shall be determined in accordance with requirements contained in 60.46b(j)(1) through (j)(13).

NO_x Requirements

Applicable NO_x requirements include 60.46b(a), (c), and (e).

Paragraph 60.46b(a) applies because Boiler No. 1 is subject to NO_x standards when burning oil or natural gas. NO_x emission standards apply at all times, including periods of startup, shutdown, and malfunction.

Paragraph 60.46b(c) applies, and requires performance testing to demonstrate compliance with 60.44b NO_x standards as specified in 60.46b(e) or (f), or (g) and (h). *[60.46b(f), (g), and (h) do not apply, leaving only (e), which requires a NO_x CEMS.]*

Paragraph 60.46b(e) applies, and requires that the NO_x performance test be conducted as required under 60.8 using the NO_x CEMS.

Paragraph 60.46b(e)(1) applies. For the initial compliance test, compliance with the NO_x standard based on the 30-day average emission rate, which is calculated as the average of all hourly emissions data recorded by the CEMS during test period of 30 successive boiler operating days.

Paragraph 60.46b(e)(2) applies when burning residual oil with a nitrogen content greater than 0.30 weight percent. After the initial performance test is completed or was required to be completed under 60.8, compliance with the NO_x standard is based on a 30-day rolling average emission rate. A new 30-day average emission rate is calculated each boiler operating day as the average of all the hourly NO_x CEMS emission data for the preceding 30 boiler operating days.

Paragraph 60.46b(e)(3) does not apply because the Boiler No. 1 heat input capacity is less than 73 MW (250 MMBtu/hr).

Paragraph 60.46b(e)(4) applies any time Boiler No. 1 is burning natural gas, distillate oil, or residual oil having a nitrogen content of 0.30 weight percent or less. Upon request, the facility shall determine compliance with the NO_x standards through the use of a 30-day performance test. Otherwise, NO_x

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emissions data collected per 60.48b(g)(1) [using a NO_x CEMS] or (g)(2) [using an approved NO_x PEMS] are used to calculate a 30-day rolling average emission rate on a daily basis and used to prepare excess emission reports, but will not be used to determine compliance with the NO_x standards.

Paragraph 60.46b(e)(5) applies when Boiler No. 1 is burning residual oil having a nitrogen content greater than 0.30 weight percent. It is important to note that the EPA has identified a typographical error in 60.46b(e)(5) (See EPA Applicability Determination Index, Document No. NN06). The correct version of this requirement is: “If the owner or operator of an affected facility which combusts residual oil does not sample and analyze the residual oil for nitrogen content, as specified in 60.49b(e), the requirements of paragraph (2) [not iii] of this section apply and the provisions of paragraph (4) [not iv] of this section are inapplicable.”

Therefore, if the permittee chooses to sample and analyze residual oil for nitrogen content, as specified in 60.49b(e), the analysis and recordkeeping requirements of 40 CFR 60.46b(e)(4) apply.

In accordance with 40 CFR 60.46b(e)(5), if the permittee chooses not to conduct nitrogen content sampling of residual oils, the permittee must operate the NO_x CEMS at all times when burning residual fuel oil.

Paragraph 60.46b(f) does not apply because Boiler No. 1 is not a duct burner used in a combined cycle system.

Paragraphs 60.46b(g) and (h) do not apply because Boiler No. 1 does not have a combined annual capacity factor of 10 percent or less for natural gas, distillate oil, and residual oil.

60.47b. Emission Monitoring for SO₂.

Paragraph 60.47b(a), SO₂ emissions monitoring, does not apply when burning natural gas or propane, because the SO₂ emission limits in 60.42b do not apply when burning these fuels.

To avoid triggering CAM, a continuous compliance determination method for SO₂ (i.e., CEMS plus O₂ or CO₂ measurement, or the alternative sampling and analysis method) must be used at all times when burning residual or distillate fuel oil, but not when burning very low sulfur fuel oil, propane or natural gas. “Continuous” means collecting data at least once every 24 hours if post-control SO₂ emissions are less than 100 T/yr, and at least every 15 minutes, if post-control SO₂ emissions are 100 T/yr or more (see 40 CFR 64.3(b)(4)(ii) and (iii)). This permit requires monitoring to demonstrate the level of post-control SO₂ emissions.

Paragraph 60.47b(a), SO₂ emissions monitoring, applies when burning fuel oil, and requires either:

- Per 60.47b(a), a CEMS for measuring SO₂ emissions and either O₂ or CO₂ concentrations per 60.47b(a),
- The alternative method specified in 60.47b(b), or
- An alternative approved by the EPA per 60.13(h)(i)(1). Either of these options would be considered a continuous compliance determination method for the purpose of CAM avoidance (see the 40 CFR 64 discussion below).

The monitoring requirements in 60.47b(c), (d), and (e) apply if the facility uses a CEMS to monitor SO₂ emissions.

Per 60.47b(f) and (g), emissions monitoring is not required when burning very low sulfur fuel oil, if fuel receipts are obtained as described in 60.49b(r), and fuel supplier certifications are maintained.

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60.48b. Emission Monitoring for PM and NO_x.

The opacity standards of 60.43b(f) and (g) apply, therefore the requirements of 60.48b(a) for installation of a continuous opacity monitoring system (COMS) apply. Given the difficulties inherent in using a COMS in conjunction with a wet scrubber, one of the following options must be met to meet the requirement for continuous opacity monitoring:

- Install and operate a PM CEMS per 60.48b(k); or
- Use an alternative method approved by the EPA per 60.13(h)(i)(1).

Per 60.48b(j), PM emissions monitoring is not required when burning very low sulfur fuel oil or liquid or gaseous fuels with potential SO₂ emission rates of 140 ng/J (0.32 lb/MMBtu) heat input or less, if fuel supplier certifications of the fuel sulfur content are maintained.

The NO_x monitoring requirements specified in 60.48b(g) apply since the boiler heat input capacity is less than 250 MMBtu/hr and it will have an annual capacity factor greater than 10% for “residual oil having a nitrogen content of 0.30 weight percent or less, natural gas, distillate oil, or any mixture of these fuels.” Therefore, one of the following options must be met per 60.48b(g):

- Install and operate a continuous monitoring system for measuring NO_x emissions per 60.48b(b) through 60.48b(f), or
- Monitor boiler operating conditions and “predict” NO_x emission rates pursuant to a plan submitted and approved per 60.49b(c). EPA has delegated authority to Idaho for this NSPS, so this predictive emissions monitoring system (PEMS) plan shall be submitted to Idaho DEQ for approval rather than to the EPA.

The following requirements of this section do not apply: 60.48b(b)(2), 60.48(e)(1), 60.48b(h), and 60.48b(i).

60.49b. Reporting and Recordkeeping Requirements.

All paragraphs of this section apply to Boiler No. 1 except as noted below.

Compliance with 60.49b(c) will be required only if the facility elects to use a PEMS instead of a CEMS for monitoring NO_x emissions.

The reporting requirements of 60.49b(l) do not apply because the testing requirements of 60.45b(d) do not apply to this Boiler. 60.49b(p) and (q) do not apply since the NO_x requirements of 60.44b(j) and (k) do not apply.

The following requirements of this section do not apply: 60.49b(l), 60.49b(n), 60.49(p), 60.49b(q), 60.49b(s), 60.49b(t), and 60.49b(u).

The following information applies to the SO₂ reporting requirements under 60.49b(j).

The reporting requirements of 60.49b(k) do not apply when the SO₂ compliance and performance testing standards under 60.45b don’t apply. This occurs, per 60.45b(j), when the facility combusts only very low sulfur oil and fuel receipts are obtained in accordance with 60.49b(r). If the facility is not able to obtain fuel receipts in accordance with 60.49b(r), then the reporting requirements of 60.49b(k) apply.

The reporting requirements of 60.49b(m) do not apply when the emission monitoring requirements under 60.47b don’t apply. This occurs, per 60.47b(f), when the facility combusts

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only very low sulfur oil (which is required by the permit) and fuel receipts are obtained in accordance with 60.49b(r). If the facility is not able to obtain fuel receipts in accordance with 60.49b(r), then the reporting requirements of 60.49b(m) apply.

40 CFR 60.1 through 60.19, NSPS General Provisions. The NSPS General Provisions are given by 40 CFR Part 60 Subpart A. The General Provisions which apply to the boiler project have been added to the permit. The following requirements in this subpart do not apply: 60.18.

40 CFR 60 Subpart Kb New Source Performance Standards (NSPS) of Performance for Volatile Organic Liquid Storage Vessels (including petroleum liquid storage vessels) for which Construction, Reconstruction, or Modification Commenced after July 23, 1984.

§ 60.110b Applicability and designation of affected facility.

§60.110b(a) Except as provided in paragraph (b) of this section, the affected facility to which this subpart applies is each storage vessel with a capacity greater than or equal to 75 cubic meters (m³) that is used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984.

§60.110b(b) This subpart does not apply to storage vessels with a capacity greater than or equal to 151 m³ storing a liquid with a maximum true vapor pressure less than 3.5 kilopascals (kPa) or with a capacity greater than or equal to 75 m³ but less than 151 m³ storing a liquid with a maximum true vapor pressure less than 15.0 kPa.

In a final rule issued on October 15, 2003, EPA revised Sections 110b(a) and (b), and removed and reserved 110b(c). Under the old Section 60.110b(c), tanks storing a liquid with a maximum true vapor pressure less than 3.5 kPa were exempt from the NSPS general provisions (40 CFR Subpart A) and the provisions of Subpart Kb, except for the recordkeeping requirements contained in 60.116b(a) and (b).

The maximum true vapor pressure of the fuel oil ranges from approximately 0.055 kPa (Tier II application, p. 4-15, which appears to be for residual fuel oil) to 0.067 kPa (a typical maximum pressure for distillate fuel oil).

The three existing 30,000-gallon (113.6 cubic meters [m³]) fuel oil storage tanks have capacities between 75 m³ and 151 m³ and will store a liquid with a maximum true vapor pressure less than 15.0 kilopascals (kPa). In accordance with Section 110b(b) of the current requirements of Subpart Kb, these three tanks are exempt from this NSPS.

6.5 NESHAP Applicability (40 CFR 61)

The Idahoan potato dehydration facility is not subject to any of the source categories under regulation 40 CFR 61.

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6.6 MACT Applicability (40 CFR 63)

The Idahoan potato dehydration facility does not emit or have the potential to emit 10 or more tons per year of any single HAP or 25 tons per year or more of all HAPs combined, so is not subject to any of the major source MACTs. The facility is not subject to any of the area source categories under regulation 40 CFR 63.

6.7 CAM Applicability (40 CFR 64)

Compliance Assurance Monitoring (CAM) applicability was evaluated on a pollutant-specific basis for each emissions unit as summarized in Table 6.1. Boiler No. 1 is exempt under 64.2(b) from CAM requirements when burning oil (other than very low sulfur oil) because the Tier I permit requires the use of a continuous compliance determination method for SO₂ when combusting distillate or residual fuel oil. Boiler No. 1 will not be subject to CAM requirements when burning very low sulfur oil because a control device is not required to demonstrate compliance. Boiler No. 2 is exempt from CAM requirements because it does not meet the applicability criteria.

Table 6.1 CAM APPLICABILITY SUMMARY

Pollutant Specific Emissions Unit	40 CFR 64.2(a)(1) Emission Limits and Standards ^a	40 CFR 64.2(a)(2) Controls Used for Compliance?	40 CFR 64.2(a)(3) Potential pre-control emissions > 100 TPY?	40 CFR 64.2(b)(1)(i) Exemption?	Potential post-control emissions ≥ 100 TPY?	40 CFR 64.2(b)(1)(vi) Exempt because Tier I requires continuous compliance determination method?
Boiler No. 1 burning Residual Oil or ASTM #1 or #2 Oil	<i>SO₂</i> NSPS Subpart Db, 60.42b	Yes. Wet scrubber	Yes. 1,253 TPY (Residual) 358 TPY (ASTM #2)	Not Exempt. NSPS Subpart Db was proposed prior to November 15, 1990.	Yes, if run 100% on 1.75% S fuel oil. Per 64.3(b)(4)(ii), "continuous" = minimum 15 minutes No, if run mix of fuels. Per 64.3(b)(4)(iii), "continuous" = daily	Exempt because Tier I permit requires a continuous compliance determinati on method per NSPS Subpart Db, 60.47b (CEMS) Permit Condition 3.13.
	<i>PM & PM₁₀</i> NSPS Subpart Db, 60.43b IDAPA 58.01.01.676 (grain loading)	Yes. Wet scrubber/ venturi	No 94.9 TPY (PM)	n/a		n/a
	<i>NO_x</i> NSPS Subpart Db	No	n/a	n/a		n/a
Boiler No. 1 burning very low sulfur oil	<i>SO₂</i> NSPS Subpart Db, 60.42b(a)	No, scrubber not req'd when burning very low S fuel oil	Yes. 215 TPY	n/a		n/a
	<i>PM</i> NSPS Subpart Db, 60.43b IDAPA 58.01.01.676 (grain loading)	Yes. Wet scrubber/ venturi	No 71 TPY (PM)	n/a		n/a
	<i>NO_x</i> NSPS Subpart Db	No	n/a	n/a		n/a
Boiler No. 1 burning natural gas or propane	<i>SO₂</i> No. NSPS Subpart Db, 60.42b does not apply when burning these fuels.	n/a	n/a	n/a		n/a
Boiler No. 2	<i>PM</i> IDAPA 58.01.01.677 (grain loading)	No	n/a n/a	n/a n/a		n/a n/a

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Boiler No. 1 Pre- and Post-Control SO₂ Emissions, Emission Factors from AP-42, Section 1.3 (9/98):
 Pre-Control SO₂ Emissions (TPY) = (1,041 gal/hr)(8760 hr/yr) (157S lb/1000gal) / (2000 lb /ton)
 Post-Control Emissions are based on 92% reduction in wet scrubber.

<u>Fuel Type</u>	<u>Pre-Control Emissions</u>	<u>Post-Control Emissions</u>
1.75% S residual fuel oil:	SO ₂ = 1,253 TPY	100.2 TPY (LARGE PSEU)
0.5% S distillate fuel oil (ASTM #2):	SO ₂ = 358 TPY	28.6 TPY
0.3% S distillate fuel oil (ASTM #1):	SO ₂ = 215 TPY	17.2 TPY

Boiler No. 1 Pre- and Post-Control PM Emissions, Emission Factors from AP-42, Section 1.3 (9/98):
 Pre-Control PM Emissions (TPY) = (1,041 gal/hr)(8760 hr/yr)(ton/2000 lb)(EF_{filterable} + EF_{condensable})
 Post-Control Emissions are based on meeting NSPS limit of 0.03 lb PM/MMBtu @ 150 MMBtu/hr

<u>Fuel Type and Emission Factor</u>	<u>Pre-Control Emissions</u>	<u>Post-Control Emissions</u>
1.75% S residual oil: EF = (9.19S + 3.22)/10 ³ gal) + (1.5/10 ³ gal) = 0.0208	PM = 94.9 TPY	19.71 TPY
0.5% S distillate fuel oil (ASTM #2): EF = (2/10 ³ gal) + (1.3/10 ³ gal) = 0.0033	PM = 15 TPY	

6.8 Acid Rain Permit (40 CFR 72-75)

The Idahoan potato dehydration facility is not subject to any of the source categories under regulation 40 CFR 72-75.

7. PUBLIC COMMENT

As required by IDAPA 58.01.01.364, a public comment period was made available to the public from May 12, 2009 to June 11, 2009. During this time, comments were not submitted in response to DEQ's proposed action.

8. EPA REVIEW OF PROPOSED PERMIT

As required by IDAPA 58.01.01.366, DEQ provided the proposed permit to EPA Region 10 for its review and comment on July 24, 2009, via e-mail. On July 30, 2009, EPA Region 10 responded to DEQ via e-mail indicating EPA's response was no comments.

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 14, 2009
Project/Permit No.: T1-030535 **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 type="checkbox"/>	<input checked="" 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?

Appendix B – Emissions Inventory

Source	Emission Inventory												
	Pollutant											CO	
	PM (w/o scrubber control for Boiler No. 1)		PM-10		VOC		SO ₂		NO _x		CO		
lb/yr	ton/yr	lb/yr	ton/yr	lb/yr	ton/yr	lb/yr	ton/yr	lb/yr	ton/yr	lb/yr	ton/yr	lb/yr	ton/yr
Boiler No. 1	4.50	19.71	4.50	19.71	1.33	5.84	22.98	100.22	48.93	214.30	5.21	22.80	
Boiler No. 2	0.05	0.21	0.05	0.21	0.04	0.15	0.004	0.02	0.64	2.79	0.54	2.35	
Cyclone	0.13	0.57	0.07	0.29									
Drum Dryer 1	1.95	8.54	1.95	8.54			0.01	0.05					
Drum Dryer 2	1.95	8.54	1.95	8.54			0.01	0.05					
Drum Dryer 3	1.95	8.54	1.95	8.54			0.01	0.05					
Drum Dryer 4	1.95	8.54	1.95	8.54			0.01	0.05					
Drum Dryer 5	1.95	8.54	1.95	8.54			0.01	0.05					
Drum Dryer 6	1.95	8.54	1.95	8.54			0.01	0.05					
Drum Dryer 7	1.95	8.54	1.95	8.54			0.01	0.05					
Drum Dryer 8	1.95	8.54	1.95	8.54			0.01	0.05					
Drum Dryer 9	1.95	8.54	1.95	8.54			0.01	0.05					
Drum Dryer 10	1.95	8.54	1.95	8.54			0.01	0.05					
Drum Dryer 11	1.95	8.54	1.95	8.54			0.01	0.05					
Drum Dryer 12	1.95	8.54	1.95	8.54			0.01	0.05					
National Dryer													
Process Emissions	1.71	7.49	1.71	7.49			0.081	0.35					
Fluidized Bed Dryer	3.53	15.48	3.53	15.48	0.02	0.11	0.09	0.38	0.67	2.94	0.38	1.66	
Flake Packaging													
Bulk Line	0.120	0.53	0.120	0.53									
Flake Packaging Line	0.080	0.35	0.080	0.35									
Flake Packaging Tank Line	0.080	0.35	0.080	0.35									
Flake Packaging Drum Negative Air													
Baghouse	0.180	0.79	0.180	0.79									
National Dryer A1	0.03	0.12	0.03	0.12	0.02	0.09	0.06	0.26	0.55	2.39	0.30	1.32	
National Dryer A2	0.03	0.12	0.03	0.12	0.02	0.09	0.06	0.26	0.55	2.39	0.30	1.32	
National Dryer B	0.03	0.12	0.03	0.12	0.02	0.09	0.06	0.26	0.55	2.39	0.30	1.32	
National Dryer C	0.03	0.12	0.03	0.12	0.02	0.09	0.06	0.26	0.55	2.39	0.30	1.32	
Propane Heaters	0.03	0.12	0.03	0.12	0.02	0.09	0.06	0.26	0.68	3.00	0.30	1.32	
Tanks						0.0012							
TOTAL	33.92	148.57	33.86	148.29	1.48	6.63	23.47	102.82	53.11	232.60	7.63	31.42	

Figure B.1 This table was provided by JBR Consulting and matching the emissions calculated in Section 4.6. It should be noted that a 1 gallon to 8 pound ratio of residual oil #6 was assumed for the calculations of Boiler #1.

12.0 DEMONSTRATION OF COMPLIANCE WITH TOXIC STANDARDS

12.1 TAPS

Table 12.1-1 summarizes the TAP emissions and the respective EL thresholds from IDAPA 58.01.01 585 and 586. Non-carcinogens which exceed the EL include cobalt, phosphorus and vanadium. Carcinogens exceeding the EL are arsenic, beryllium, cadmium, chromium VI, formaldehyde, nickel, and total PAHs.

Table 12.1-1 TAPs Compared to the EL

NON-CARCINOGENS				
Pollutant	Max. Hourly Emissions	Screening Level	Modeling?	Emissions
	(lb/hr)	(lb/hr)	(Y/N)	(tons/yr)
Antimony	5.47E-03	3.3E-02	N	2.39E-02
Barium	2.80E-03	3.3E-02	N	1.22E-02
Chromium	9.20E-04	3.3E-02	N	3.99E-03
Cobalt	6.27E-03	3.3E-03	Y	2.75E-02
Copper	1.86E-03	6.7E-02	N	8.11E-03
Ethylbenzene	6.62E-05	2.9E+01	N	2.90E-04
Fluoride	3.88E-02	1.67E-01	N	1.70E-01
Hexane	5.20E-02	1.2E+01	N	2.28E-01
Manganese	3.13E-03	3.33E-01	N	1.37E-02
Mercury	1.25E-04	3.E-03	N	5.41E-04
Molybdenum	8.51E-04	6.67E-01	N	3.70E-03
Naphthalene	1.19E-03	3.33E+00	N	5.21E-03
Pentane	7.51E-02	1.18E+02	N	3.29E-01
Phosphorous	9.85E-03	7.E-03	Y	4.31E-02
Selenium	7.12E-04	1.3E-02	N	3.12E-03
1,1,1-Trichloroethane	2.67E-04	1.3E+02	N	1.08E-03
Toluene	6.53E-03	2.5E+01	N	2.86E-02
o-Xylene	1.28E-04	2.9E+01	N	4.97E-04
Vanadium	3.33E-02	3.0E-03	Y	1.45E-01
Zinc	3.09E-02	6.67E-01	N	1.36E-01

Figure B.2 This table was provided by JBR Consulting on August 30, 2006 and matching the emissions calculated in Section 4.5. Those Non-Carcinogens TAPS that required modeling were performed by Kevin Schilling. His findings are discussed in Figure B.5.

Table 12.1-2 Cont. TAPs Compared to the EL

CARCINOGENS				
Pollutant	Max. Hourly Emissions	Screening Level	Modeling?	Emissions
	(lb/hr)	(lb/hr)	(Y/N)	(tons/yr)
Arsenic	1.38E-03	1.5E-06	Y	6.04E-03
Benzene	2.83E-04	8.0E-04	N	1.18E-03
Beryllium	2.93E-05	2.8E-05	Y	1.28E-04
Cadmium	4.46E-04	3.7E-06	Y	1.92E-03
Chromium VI	2.58E-04	5.6E-07	Y	1.13E-03
Formaldehyde	3.65E-02	5.1E-04	Y	1.58E-01
Nickel	6.24E-05	2.7E-05	Y	2.66E-04
Benzo(a)pyrene	3.47E-08	2.0E-06	N	1.52E-07
Benz(a)anthracene	4.23E-06	NA	NA	1.85E-05
Benzo(b,k)fluoranthene	1.59E-06	NA	NA	6.93E-06
Chrysene	2.53E-06	NA	NA	1.10E-05
Dibenzo(a,h)anthracene	1.79E-06	NA	NA	7.79E-06
Indeno(1,2,3-cd)pyrene	2.26E-06	NA	NA	9.88E-06
Total PAHs	1.22E-05	2.0E-06	Y	5.34E-05

Consistent with IDAPA 585 and 586 regulations, modeling was conducted for the 24-hour averaging time for the AAC evaluation and the annual averaging time for the AACC evaluation for all TAPs identified as emitted above the IDAPA Emission limits (ELs). The TAPs modeled included the IDAPA 585 non-carcinogens cobalt and vanadium, and the IDAPA 586 carcinogens arsenic, beryllium, cadmium, chromium VI, formaldehyde, nickel, and PAHs. The same model layout, parameters, options, meteorological data, and receptor network described for the criteria pollutant modeling were used for the TAP modeling.

Table 12.1-2 shows the modeled ambient concentrations which are compared to the AAC or AACC; compliance is demonstrated for all TAPs. All maximum predicted annual average impacts occurred on the north boundary north of the plant, and all maximum predicted 24-hour average impacts occurred on the west boundary NW or N-NW of the plant.

Figure B.3 This table was provided by JBR Consulting on August 30, 2006 and matching the emissions calculated in Section 4.5. Those carcinogens TAPS that required modeling were performed by Kevin Schilling. His findings are discussed in Figure B.5.

Table 12.1-3 TAPs Compared to the AAC or AACC (for those exceeding the EL)

Non-Carcinogens			
Pollutant	Modeled 24-hour µg/m3	AAC µg/m3	% AAC
Cobalt	0.00399	2.5	0.16%
Phosphorus	0.00626	5.0	< 0.1%
Vanadium	0.02111	5.0	0.4%
Carcinogens			
Pollutant	Modeled Annual µg/m3	AACC µg/m3	% AACC
Arsenic	1.30E-04	2.30E-04	56.2%
Beryllium	<1.0E-05	4.20E-03	<0.2%
Cadmium	4.00E-05	5.60E-04	7.1%
Chromium VI	2.00E-05	8.30E-05	24.1%
Formaldehyde	3.32E-03	7.70E-02	4.3%
Nickel	1.00E-05	4.20E-03	0.2%
Total PAHs	<1.0E-05	1.40E-02	<0.1%

12.2 HAZARDOUS AIR POLLUTANTS (HAPs)

The table below summarizes HAP emissions from RDO. As shown in the table, RDO is not a major source for HAPs.

Table 12.2-1 HAP Emissions

Pollutant	Emissions (tpy)
Arsenic	6.04E-03
Benzene	1.18E-03
Beryllium	1.26E-03
Cadmium	1.37E-03
Ethylbenzene	2.90E-04
Formaldehyde	1.58E-01
Chromium	1.13E-03
Lead	1.18E-04
Mercury	1.29E-03
1,1,1 - Trichloroethane (Methyl Chloroform)	1.08E-03
Naphthalene	5.21E-03
Nickel	2.66E-04

Pollutant	Emissions (tpy)
Xylene	4.97E-04
Selenium	6.31E-03
Toluene	2.86E-02
Phosphorus	4.31E-02
POM	1.98E-06
Dichlorobenzene	2.70E-05
Hexane	4.05E-02
Total Pollutant Emissions	2.96E-01

Note: Emission Factors for lead, POM, dichlorobenzene and hexane are as follows (i.e., for those HAPs not included with TAP calculations):

Lead	1.20E-07	lb/gal
	5.00E-04	lb/MMscf
POM	8.82E-05	lb/MMscf
Dichlorobenzene	1.20E-03	lb/MMscf
Hexane	1.8	lb/MMscf

Figure B.4 These tables were provided by JBR Consulting on August 30, 2006. Those modeled TAPS were shown to be less than 100% of the acceptable ambient concentration (AACC). Also, the HAPs were shown to be less than 100 T/yr and less than 25 T/yr of any one pollutant. Therefore they are no regulatory concern.

The following statement was issued by Kevin Schilling on November 9, 2006 regarding Idahoan Foods, LLC impact on ambient air. Since then the facility has not made significant changes to warrant updated modeling as these conclusions were made regarding permit No. T2-060510. These results were then accepted in the following permit No. P-2007.0017. The current PTC that is incorporated into this Tier I operating permit is P-2009.0026, which was only a facility name, facility contact and responsible official change. No emissions or TAPS increases were made.

4.0 Conclusions

The ambient air impact analysis submitted, consisting of dispersion modeling and an evaluation of applicable background concentrations, demonstrated to DEQ's satisfaction that emissions from the facility, as represented by the applicant in the permit application and DEQ analyses, will not cause or significantly contribute to a violation of any air quality standard.

Figure B.5 For complete details on the modeling results review Appendix C of the statement of basis of permit No. T2-060510.

Appendix C – Facility Comments for Draft Permit

Facility Comments were received via email from Mr. Leo Herbert at Idahoan Foods, LLC on May 6, 2009. He suggested three updates to the permit which were incorporated and shown below:

- Page 1, Block 6. should be: 72 Potato Road – It was updated from 72 Dehigh Road
- Page 5, 1.3 section 3, under emissions control. There are 2 ending brackets). With no beginning brackets (- The missing beginning brackets were added to the emissions control table
- Page 34, Table 5.2, Permit Conditions 5.1, Permit Limit says to see Table 5.2 (we are already in it?) – The reference to Table 5.2 was changed to reference Table 5.1