



State of Idaho  
Department of Environmental Quality  
Air Quality Division

**AIR QUALITY PERMIT  
STATEMENT OF BASIS**

**Tier II Operating Permit and Permit to Construct**

**No. T2-2009.0027**

**Final**

**Idahoan Foods, LLC**

**Idaho Falls, Idaho**

**Facility ID No. 019-00038**

**April 13, 2009**

**Eric Clark** 

**Permit Writer**

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

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## Acronyms, Units, and Chemical Nomenclature

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
cfm	cubic feet per minute
CAM	Compliance Assurance Monitoring
CO	carbon monoxide
DEQ	Department of Environmental Quality
EPA	Environmental Protection Agency
HAPs	Hazardous Air Pollutants
IDAPA	A numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
lb/hr	pounds per hour
m	meter(s)
m/sec	meters per second
MACT	Maximum Available Control Technology
MMBtu	Million British thermal units
NAAQS	National Ambient Air Quality Standards
NESHAP	Nation Emission Standards for Hazardous Air Pollutants
NO <sub>x</sub>	nitrogen oxides
NSPS	New Source Performance Standards
O <sub>3</sub>	ozone
PM	Particulate Matter
PM <sub>10</sub>	Particulate Matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD	Prevention of Significant Deterioration
PTC	Permit to Construct
PTE	Potential to Emit
Rules	Rules for the Control of Air Pollution in Idaho
SM	synthetic minor
SO <sub>2</sub>	sulfur dioxide
TAP	Toxic Air Pollutant
T2/PTC	Tier II operating permit and permit to construct
T/yr	Tons per year
µg/m <sup>3</sup>	micrograms per cubic meter
UTM	Universal Transverse Mercator
VOC	volatile organic compound

## **1. FACILITY INFORMATION**

### **1.1 Facility Description**

Idahoan Foods, LLC is a potato processing company that dehydrates potatoes to make flakes, slices, and dices in Idaho Falls, Idaho. The process includes dryers and dehydration lines, which are sources of particulate matter emissions.

### **1.2 Permitting Action and Facility Permitting History**

This T2/PTC is a transfer by revision of an existing T2/PTC. Permit status is noted as active and in effect (A) or superseded (S).

May, 9, 2008                      T2-2007.0116, Initial T2/PTC replaced, Permit status (S)

## **2. APPLICATION SCOPE AND APPLICATION CHRONOLOGY**

### **2.1 Application Scope**

This project is a T2/PTC revision for a facility name, facility contact and responsible official change. No other substantive changes were made to the permit.

### **2.2 Application Chronology**

February 20, 2009              DEQ received a request for a facility name change from Idahoan Foods, LLC

March 26, 2009                DEQ sent a draft T2/PTC to the facility for review.

April 13, 2009                The final permit and statement of basis were issued.

## **3. TECHNICAL ANALYSIS**

This section lists the emissions units, describes the production or manufacturing processes, and provides the emissions inventory for this facility. For details regarding the emissions units, process descriptions, and the emissions inventory for this facility, refer to the Statement of Basis for T2/PTC No. T2-2007.0116 issued on May 9, 2008. This information was not changed as a result of this project.

### **3.1 Origin of Existing Emissions Limits**

All permit conditions were established in T2/PTC No. P-2007.0116 as it was the initial permit for the facility.

Permit Condition 3.3 was based on emissions inventory associated with the application.

Permit Conditions 3.4 and 3.5 were based on Idaho State Rules for the Control of Air Pollution in Idaho section IDAPA 58.01.01.677

Permit Conditions 3.6 was based on Permit Conditions 3.4 and 3.5 were based on Idaho state Rules for the Control of Air Pollution in Idaho section IDAPA 58.01.01.677

Permit Conditions 3.7-3.11 and 4.1-4.9 were based on Rules for the Control of Air Pollution in Idaho section IDAPA 58.01.01.201 through 228.

## **4. REGULATORY REVIEW**

### **4.1 Attainment Designation (40 CFR 81.313)**

The facility is located in Bonneville County, which is designated as attainment or unclassifiable for PM<sub>10</sub>, PM<sub>2.5</sub>, CO, NO<sub>2</sub>, SO<sub>x</sub>, and Ozone. Reference 40 CFR 81.313.

### **4.2 Permit to Construct (IDAPA 58.01.01.201) and Tier II Operating Permit (IDAPA 58.01.01.401)**

This permitting action is a Tier II operating permit and a Permit to Construct for revision to T2/PTC permit No. T2-2007.0116.

### **4.3 Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70)**

Title V permitting program requirements do not apply to this facility. The potential to emit of the facility for emission of any single criteria pollutant is less than the 100 T/yr applicability threshold. In addition, the potential to emit any single hazardous air pollutant (HAP) is less than 10 T/yr and the potential to emit any combination of HAPs is less than 25 T/yr.

### **4.4 PSD Classification (40 CFR 52.21)**

Prevention of Significant Deterioration (PSD) requirements do not apply to this facility. This facility is not a designated facility, and the emission of any single pollutant is less than the 250 T/yr applicability threshold.

### **4.5 NSPS Applicability (40 CFR 60)**

The facility's 200,000 gallon storage tank was constructed in 1974 and is subject to 40 CFR 60.110.c (2) and 40 CFR 60.113.d (1). The storage tank shall store distillate fuel oil only. Since only distillate fuel oil shall be stored in the 200,000 gallon storage tank, the facility is not required to maintain any other monitoring records.

### **4.6 NESHAP Applicability (40 CFR 61)**

None of the National Emissions Standards for Hazardous Air Pollutants (NESHAP) apply to this facility.

### **4.7 MACT Applicability (40 CFR 63)**

None of the Maximum Achievable Control Technology (MACT) requirements apply to this facility.

### **4.8 CAM Applicability (40 CFR 64)**

This facility is not classified as a major facility under the Title V program, therefore, CAM requirements do not apply.

### **4.9 Permit Conditions Review**

**Permit Cover page:** The facility name, permittee contact information, and responsible official have been changed. Also, the classification was updated to SM80 to reflect the 94.05 ton/yr SO<sub>2</sub> emitted by the facility. DEQ included a NAICS (North American Industry Classification System) code on the cover page of this permit and an updated General Provisions to reflect changes that have been made to the T2/PTC.

**Permit Condition 2.9:** Typographical errors have been corrected.

No other permit conditions in this revised permit have been added, revised, modified, or deleted as a result of this permitting action.

**5. PERMIT FEES**

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

**6. PUBLIC COMMENT**

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

## **Appendix A – AIRS Information**

## AIRS/AFS Facility-wide Classification Form

**Facility Name:** Idahoan Foods, LLC - Idaho Falls  
**Facility Location:** 6140 West River Road, Idaho Falls, ID  
**Facility ID:** 019-00038 **Date:** April 13, 2009  
**Project/Permit No.:** T2-2009.0027 **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:

Area Classification: 

SO2	PM10	VOC
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.

Classification: 

SO2	NOx	CO	PM10	PT (PM)	VOC	THAP
SM	B	B	B	B	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.

Classification: 

SO2	NOx	CO	PM10	PT (PM)	VOC	THAP
<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.

Classification: 

SO2	NOx	CO	PM10	PT (PM)	VOC	THAP
<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?

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

Classification: 

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