



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

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www.deq.idaho.gov

C.L. "Butch" Otter, Governor  
John H. Tippetts, Director

January 28, 2016

Rich Livermore, Plant Manager  
Basic American Potato Company, Inc.  
409 West Collins Road  
Blackfoot, Idaho 83221

RE: Facility ID No. 011-00012, Basic American Potato Company, Inc., Blackfoot  
Final Permit Letter

Dear Mr. Livermore:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2010.0057 PROJ 61651 to Basic American Potato Company, Inc. located at Blackfoot for the permit revision and for the ownership transfer from Nonpareil Corporation (Facility ID No. 011-00027) to Basic American Potato Company, Inc. (Facility ID No. 011-00012). This PTC is issued in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho) and is based on the certified information provided in your PTC application received July 29, 2015.

This permit is effective immediately and replaces PTC No. P-2010.0057 project 61004 that was issued to Nonpareil Corporation on June 8, 2012. This permit does not release Basic American Potato Company, Inc. from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

This PTC was processed in accordance with IDAPA 58.01.01.209.05.c. In accordance with IDAPA 58.01.01.381.03.b, so long as the change does not violate any terms or conditions of the existing Tier I permit, you may operate the source described in the PTC immediately.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Rick Elkins, Air Quality Analyst, at (208) 236-6160 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends that the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any other staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to contact Shawnee Chen at (208) 373-0502 or [Shawnee.chen@deq.idaho.gov](mailto:Shawnee.chen@deq.idaho.gov) to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in blue ink that reads "Mike Simon".

Mike Simon  
Stationary Source Program Manager  
Air Quality Division

MS\SYC

Permit No. P-2010.0057 PROJ 61651

Enclosures

**Air Quality**  
**PERMIT TO CONSTRUCT**

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**Permittee** Basic American Potato Company, Inc.

**Permit Number** P-2010.0057

**Project ID** 61651

**Facility ID** 011-00012

**Facility Location** 409 West Collins Road  
Blackfoot, ID, 83221

**Permit Authority**

This permit (a) is issued according to the *Rules for the Control of Air Pollution in Idaho (Rules)*, IDAPA 58.01.01.200-228; (b) pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed or modified by this permit; (c) has been granted on the basis of design information presented with its application; (d) does not affect the title of the premises upon which the equipment is to be located; (e) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (f) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (g) in no manner implies or suggests that the Department of Environmental Quality (DEQ) or its officers, agents, or employees, assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment. Changes in design, equipment or operations may be considered a modification subject to DEQ review in accordance with IDAPA 58.01.01.200-228.

**Date Issued** January 28, 2016



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**Shawnee Chen, P.E., Permit Writer**



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**Mike Simon, Stationary Source Manager**

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# 1. PERMIT SCOPE

## Purpose

- 1.1 This is a revised permit to construct for the ownership transfer from Nonpareil Corporation to Basic American Potato Co., Inc. and for the changes to the facility. [1/28/2016]
- 1.2 Those permit conditions that have been modified or revised by this permitting action are identified by a date citation located directly under the permit condition and on the right hand margin.
- 1.3 This PTC replaces PTC No. P-2010.0057 project 61004, issued on June 8, 2012. [1/28/2016]
- 1.4 Requirements that are applicable to this PTC and covered under Facility-wide Conditions of the facility's Tier I operating permit are not included in this PTC to avoid duplications. These requirements are fugitive dust control and compliance, visible emissions limit and compliance, and grain loading standard for fuel-burning equipment.

Should the permittee terminate the Tier I operating permit, the permittee shall revise the PTC to include the above requirements into this PTC prior to the termination of the Tier I operating permit.

[6/8/2012]

## Regulated Sources

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

**Table 1.1 Regulated Sources**

Permit Section	Source Description	Emissions Control
2	East processing boiler, Nebraska Boiler Company, NS-C-50, 53.4 MMBtu/hr - Natural gas	None
	West processing boiler, Erie City, SA60H-21, 40.5 MMBtu/hr - Natural gas	None
GP	Scratch-mash air makeup, Hartzell, 5 MMBtu/hr	None
	Reblend-room air makeup, Hartzell, 1 MMBtu/hr	None
	Building No. 3 air makeup, Hartzell, 3 MMBtu/hr	None
	Building No. 4 air makeup, Hartzell, 10 MMBtu/hr	None
4	Processing peeler exhaust, Odenburg, 5,000 lb/hr output	None
	Flaker No. 1, Blau-Knox, 1,250 lb/hr output	None
	Flaker No. 2, Blau-Knox, 1,250 lb/hr output	None
	Flaker No. 3, Blau-Knox, 1,000 lb/hr output	None
	Flaker No. 4, Blau-Knox, 1,000 lb/hr output	None
	Flaker No. 5, Blau-Knox, 1,000 lb/hr output	None
	Grinding circuit No. 1 material transfer	Grinding circuit No. 1 baghouse, Mikropulsaire, 36 Bag, 2,500 cfm
	Grinding circuit No. 2 material transfer	Grinding circuit No. 2 baghouse, Mikropulsaire, 48 bag, 3,360 cfm
	Flake material transfer	Flake baghouse, Mikropulsaire, 100 bag, 7,000 cfm
	GP	Dehydration North boiler, Highlander 250-3, 10.5 MMBtu/hr
Dehydration South boiler, Highlander 200-111, 8.4 MMBtu/hr		None
3	Dehydration air dryer No. 1 A Stage, Proctor, 6.4 MMBtu/hr, 1,000 lb/hr output	None
	Dehydration air dryer No. 1 B & C Stage, Proctor, 2.8 MMBtu/hr, 1,000 lb/hr output	None
	Dehydration air dryer No. 2 A Stage, Proctor, 6.4 MMBtu/hr, 1,000 lb/hr output	None

Permit Section	Source Description	Emissions Control
3	Dehydration air dryer No. 2 B & C Stage, Proctor, 2.8 MMBtu/hr, 1,000 lb/hr output	None
	Dehydration air dryer No. 3 A stage, Proctor, 6.4 MMBtu/hr, 1,000 lb/hr output	None
	Dehydration air dryer No. 3 B & C stage, Proctor, 2.8 MMBtu/hr, 1,000 lb/hr output	None
	Dehydration air dryer No. 5 A stage, National, 10.4 MMBtu/hr, 1,200 lb/hr output	None
	Dehydration air dryer No. 5 B stage, National, 3.2 MMBtu/hr, 1,200 lb/hr output	None
	Dehydration air dryer No. 5 C stage, National, 3.3 MMBtu/hr, 1,200 lb/hr output	None
	Dehydration air dryer No. 6 A stage, Buhler, 10.4 MMBtu/hr, 1,200 lb/hr output	None
	Dehydration air dryer No. 6 B stage, Buhler, 3.2 MMBtu/hr, 1,200 lb/hr output	None
	Dehydration air dryer No. 6 C stage, Buhler, 3.3 MMBtu/hr, 1,200 lb/hr output	None
	Dehydration bin dryer, 1,000 lb/hr output, heat from 2 MMBtu/hr natural gas combustion	None
	GP	Wet area air makeup, Hartzell, 3.5 MMBtu/hr
South dryer room air makeup, Hartzell, 5 MMBtu/hr		None
South dryer room roof air makeup, Hartzell, 5 MMBtu/hr		None
Inspection room roof air makeup, Hartzell, 3.5 MMBtu/hr		None
Room heater, Concept Designs, 3.3 MMBtu/hr		None
3	Dehydration research dryer, Carrier, 0.88 MMBtu/hr, 125 lb/hr output	None
4	Packaging material transfer	Packaging baghouse No. 1, Mikropulsaire, 9 Bag, 630 cfm
	Packaging material transfer	Packaging baghouse No. 2, Mikropulsaire, 25 bag, 1,750 cfm
	Crush-room material transfer	Crush-room baghouse No. 1, Mikropulsaire, 9 bag, 630 cfm
	Crush-room material transfer	Crush-room baghouse No. 2, Mikropulsaire, 25 bag, 1,750 cfm
	Dehydration steam peeler, Odenberg, 5,000 lb/hr output	None
GP	Dryer 6 air makeup, Reycos, AMU-350, 3.5 MMBtu/hr, Natural gas-fired	None

[1/28/2016]

## 2. EAST AND WEST PROCESSING BOILERS

### 2.1 Process Description

The primary purpose of the east and west processing boilers is to provide steam for processes. The west processing boiler was constructed in 1962 and relocated, but not modified, in 1992. The east processing boiler was constructed in 1998 and installed at the facility in 2008.

### 2.2 Emission Control Description

Table 2.1 East and West Boiler Description

Emissions Unit / Process		Emissions Control Device
<u>East Processing Boiler</u>		Low-NO <sub>x</sub> (30ppm) burner for natural gas
Manufacturer:	Nebraska Boiler Company	
Model:	NS-C-50	
Construction date:	1998 (NSPS)	
Design capacity:	53.4 MMBtu/hr	
Fuel types:	natural gas	
<u>West Processing Boiler</u>		None
Manufacturer:	Erie City	
Model:	SA60H-21	
Construction date:	1962 (non-NSPS)	
Design capacity:	40.5 MMBtu/hr	
Maximum operation:	8,760 hr/yr	
Fuel types:	natural gas	

[1/28/2016]

## Emission Limits

### 2.3 Emission Limits

The emissions from the east and west processing boiler stacks shall not exceed any corresponding emissions rate limits listed in Table 2.2.

Table 2.2 Emission Limits<sup>(a)</sup>

Source Description	PM <sub>10</sub> <sup>(b)</sup>	
	lb/hr <sup>(c)</sup>	T/yr <sup>(d)</sup>
East processing boiler	0.4	1.74
West processing boiler	0.30	1.32

- In absence of any other credible evidence, compliance is assured by complying with permit operating, monitoring, and record keeping requirements.
- Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.
- Pounds per hour, as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference test method, continuous emission monitoring system (CEMS) data, or DEQ-approved alternative.
- Tons per any consecutive 12-calendar month period.

[1/28/2016]

## Operating Requirements

### 2.4 Fuel Type Limits

- The east boiler shall only be fueled on natural gas.
- The west boiler shall only be fueled on natural gas. The west boiler shall be rendered inoperable on No.6 fuel oil.

[1/28/2016]

## 2.5 Boiler O&M Manual

The permittee shall have developed an O&M manual for the east and west boilers. At a minimum the following items shall be addressed in the manual:

- For each boiler, include an inspection checklist which lists items that will be periodically inspected while the system is operating. The checklist shall include, but not be limited to, boiler nozzle cleaning and inspection. Describe how often these operational inspections will be performed.
- Describe periodic planned maintenance.

A copy of the initial O&M manual, and any subsequent revisions, shall be submitted to DEQ.

[6/8/2012]

## **40 CFR 60, Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (Apply to the East Processing Boiler Only)**

### 2.6 40 CFR 60.48c - Reporting and Recordkeeping

- In accordance with 40 CFR 60.48c (a), the owner or operator of each affected facility shall submit notification of the date of construction or reconstruction and actual startup, as provided by 40 CFR 60.7 and.

This notification shall include:

- The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.
  - The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.
- In accordance with 40 CFR 60.48c (g), the owner or operator of each affected facility shall record and maintain records of the amount of each fuel combusted during each operating day.
    - As an alternative, the owner or operator of an affected facility that combusts only natural gas may elect to record and maintain records of the amount of each fuel combusted during each calendar month.
    - As an alternative, the owner or operator of an affected facility or multiple affected facilities located on a contiguous property unit where the only fuels combusted in any steam generating unit (including steam generating units not subject to this subpart) at that property are natural gas, may elect to record and maintain records of the total amount of each steam generating unit fuel delivered to that property during each calendar month.
  - All records required under this section shall be maintained by the owner or operator of the affected facility for a period of two years following the date of such record in accordance with 40 CFR 60.48c(i).
  - The reporting period for any reports required is each six-month period in accordance with 40 CFR 60.48c(j). All reports shall be submitted to DEQ and shall be postmarked by the 30th day following the end of the reporting period.

[1/28/2016]

### 2.7 General Provisions – NSPS

Generally applicable reporting, record keeping and notification requirements of Subpart A of the New Source Performance Standards (NSPS, 40 CFR 60) are included in Table 2.3. These summaries are provided to highlight the notification and record keeping requirements of 40 CFR 60 for affected facilities, and are not intended to be a comprehensive listing of all general provisions requirements that may apply.

**Table 2.3 NSPS Subpart A (40 CFR 60) Summary of General Provisions for Affected Facilities**

Section	Section Title	Summary of Section Requirements
60.4	Address	<p>All notifications and reports shall be submitted to:</p> <p>Pocatello Regional Office            Department of Environmental Quality            444 Hospital Way #300            Pocatello, ID 83201</p>
60.7(b),(c)(d) and (f)	Notification and Record Keeping	<ul style="list-style-type: none"> <li>• Notification of commencement of construction postmarked no later than 30 days of such date.</li> <li>• Notification of startup postmarked within 15 days of such date.</li> <li>• Notification of physical or operational change that may increase emissions postmarked 60 days before the change is made.</li> <li>• Maintain records of the occurrence and duration of any: startup, shutdown or malfunction of the affected source; malfunction of air pollution control device; and any period when a continuous monitoring system or monitoring device is inoperative.</li> <li>• For affected units with continuous monitoring device requirements report excess emissions and monitoring system performance semiannually, postmarked by January 30<sup>th</sup> and July 30<sup>th</sup> (in the format required by NSPS).</li> <li>• Maintain in a permanent form records suitable for inspection of all measurements, system testing, performance measurements, calibration checks, and adjustments/maintenance performed. Records shall be maintained for a period of two years from the date the record is required to be generated by the applicable regulation.</li> <li>• CEMS record keeping requirements depending on whether data is automatically or manually recorded - 40 CFR 60.7(f).</li> </ul>
60.8	Performance Tests	<ul style="list-style-type: none"> <li>• The owner or operator shall provide notice at least 30 days prior to any performance test to afford an opportunity for an observer to be present during testing.</li> <li>• Within 60 days of achieving maximum production, but not later 180 days after startup the permittee shall conduct performance test(s) and furnish a written report of the results of the test(s)</li> </ul>
60.11(a),(b),(c), (d) and (g)	Compliance with Standards and Maintenance Requirements	<ul style="list-style-type: none"> <li>• Other than opacity standards, where performance tests are required compliance with standards is determined by methods and procedures established by 40 CFR 60.8.</li> <li>• Compliance with NSPS opacity standards shall be determined by Method 9 of Appendix A. The owner or operator may elect to use COM measurements in lieu of Method 9 provided notification is made at least 30 days before the performance test.</li> <li>• At all times, including periods of startup, shutdown, and malfunction to the extent practicable, the operator shall maintain and operate any affected facility and air pollution control equipment consistent with good air pollution control practices.</li> <li>• For the purposes of determining compliance with standards any creditable evidence may be used if the appropriate performance or compliance test procedure has been performed.</li> </ul>
60.12	Circumvention	<p>No owner or operator shall build, erect, install or use any article or method, including dilution, to conceal an emission which would otherwise constitute a violation.</p>
60.14	Modification	<ul style="list-style-type: none"> <li>• Physical or operational changes to source types that are regulated by a NSPS which result in an increase in hourly emissions to which a standard applies is considered a modification (unless expressly exempted the NSPS). Modified sources become subject to the NSPS standards</li> <li>• Note that in accordance with IDAPA 58.01.01.201 no owner or operator may commence a modification without first obtaining a permit to construct unless the modification is exempted from the need to obtain a permit in accordance with IDAPA 58.01.01.220-223.</li> </ul>

### 3. DRYERS

#### 3.1 Process Description

This section of the permit regulates the dryers and a bin dryer of the dehydrated piece line and a research dryer for the research and development line. These dryers have emissions from both fuel burning and potato particulate.

The dehydrated piece line cuts and dries potatoes using a steam peeler, the dryers with three stages each, and a bin dryer.

The research and development line consists of a small processing line. The emissions from the dehydration research dryer are ducted through a cyclone.

[1/28/2016]

#### 3.2 Emission Control Description

The emissions from the dryers are uncontrolled.

**Table 3.1 Dryer Descriptions**

Emissions Unit / Process	Control Devices
Dehydration air dryer No. 1 A Stage, Proctor, 6.4 MMBtu/hr, 1,000 lb/hr output	None
Dehydration air dryer No. 1 B & C Stage, Proctor, 2.8 MMBtu/hr, 1,000 lb/hr output	None
Dehydration air dryer No. 2 A Stage, Proctor, 6.4 MMBtu/hr, 1,000 lb/hr output	None
Dehydration air dryer No. 2 B & C Stage, Proctor, 2.8 MMBtu/hr, 1,000 lb/hr output	None
Dehydration air dryer No. 3 A stage, Proctor, 6.4 MMBtu/hr, 1,000 lb/hr output	None
Dehydration air dryer No. 3 B & C stage, Proctor, 2.8 MMBtu/hr, 1,000 lb/hr output	None
Dehydration air dryer No. 5 A stage, National, 10.4 MMBtu/hr, 1,200 lb/hr output	None
Dehydration air dryer No. 5 B stage, National, 3.2 MMBtu/hr, 1,200 lb/hr output	None
Dehydration air dryer No. 5 C stage, National, 3.3 MMBtu/hr, 1,200 lb/hr output	None
Dehydration air dryer No. 6 A stage, Buhler, 10.4 MMBtu/hr, 1,200 lb/hr output	None
Dehydration air dryer No. 6 B stage, Buhler, 3.2 MMBtu/hr, 1,200 lb/hr output	None
Dehydration air dryer No. 6 C stage, Buhler, 3.3 MMBtu/hr, 1,200 lb/hr output	None
Dehydration bin dryer, Nonpareil, 2.0 MMBtu/hr, 1,000 lb/hr output,	None
Dehydration research dryer, Carrier, 0.88 MMBtu/hr, 125 lb/hr output	None

[1/28/2016]

### Emissions Limits

#### 3.3 Emission Limits

The PM<sub>10</sub> emissions from any stack or dryer listed in Table 5.1 shall not exceed the corresponding emissions rate limits listed in Table 5.1.

### Operating Requirements

#### 3.4 Throughput Limits

The maximum daily throughput of potato material on a dry basis for each process identified in Table 3.2 shall not exceed the corresponding daily limits listed in the table. The maximum annual throughput of potato material on a dry basis for each process identified in Table 3.2 shall not exceed the corresponding annual limits listed in Table 3.2 in any consecutive 12-month period.

**Table 3.2 Potato Material Throughput Limits**

<b>Source Description</b>	<b>Throughput Limit Tons per Day</b>	<b>Throughput Limit Tons per Year</b>
Dehydration air dryer No. 1 A stage, Proctor	12	4380
Dehydration air dryer No. 1 B & C stage, Proctor	12	4380
Dehydration air dryer No. 2 A stage, Proctor	12	4380
Dehydration air dryer No. 2 B & C stage, Proctor	12	4380
Dehydration air dryer No. 3 A stage, Proctor	12	4380
Dehydration air dryer No. 3 B & C stage, Proctor	12	4380
Dehydration air dryer No. 5 A stage, National	14.4	5256
Dehydration air dryer No. 5 B stage, National	14.4	5256
Dehydration air dryer No. 5 C stage, National	14.4	5256
Dehydration air dryer No. 6 A stage, Buhler	14.4	---
Dehydration air dryer No. 6 B stage, Buhler	14.4	---
Dehydration air dryer No. 6 C stage, Buhler	14.4	---
Dehydration bin dryer	12	4380
Dehydration research dryer, Carrier	1.5	548

[1/28/2016]

**3.5 Stack Height**

The height of each exhaust stack for the No. 5B dehydration dryer, the No. 5C dehydration dryer, and the dehydration bin dryer shall be at least 41 feet 4 inches, as measured from the ground level elevation.

**Monitoring and Recordkeeping Requirements**

**3.6 Monitor Operating Parameters**

The permittee shall monitor and record daily, when operating, the throughput on a dry basis of each of the sources listed in Table 3.2 in tons per day. The permittee shall compile daily throughput data and record annual throughput monthly. The annual throughput shall be calculated by adding the current month throughput to the total throughput of the previous consecutive 11 months period. A compilation of the most recent five years of records shall be kept onsite and shall be made available to DEQ representatives upon request.

[6/8/2012]

## 4. MATERIAL TRANSFER OPERATIONS, FLAKERS, AND PEELERS

### 4.1 Process Description

This section regulates potato material transfer operations, flakers, and peelers, which have potato particulate emissions and no emissions from fuel combustion.

Potato material is transferred from one process to another pneumatically. Baghouses are used to control particulate emissions from these processes. A list of the processes and the corresponding baghouses are shown in Table 4.1.

The flake line uses a processing peeler to peel potatoes. The potatoes are then processed and sent to the flakers. The potato material is then conveyed to grinding circuits No. 1 and No. 2.

The crush line grinds off-spec potato material. Emission sources are through two crush-room baghouses.

[6/8/2012]

### 4.2 Emission Control Description

Particulate emissions from the transfer operations are controlled by baghouses as listed in Table 4.1. All other emissions are uncontrolled.

**Table 4.1 Material Transfer Operations, Flakers, and Peelers Descriptions**

Emissions Unit / Process	Emissions Control Device
Processing peeler exhaust, Odenburg, 5,000 lb/hr output	None
Flaker No. 1, Blau-Knox, 1,250 lb/hr output	None
Flaker No. 2, Blau-Knox, 1,250 lb/hr output	None
Flaker No. 3, Blau-Knox, 1,000 lb/hr output	None
Flaker No. 4, Blau-Knox, 1,000 lb/hr output	None
Flaker No. 5, Blau-Knox, 1,000 lb/hr output	None
Grinding circuit No. 1 material transfer	Grinding circuit No. 1 baghouse, Mikropulsaire, 36 Bag, 2,500 Cfm
Grinding circuit No. 2 material transfer	Grinding circuit No. 2 baghouse, Mikropulsaire, 48 bag, 3,360 cfm
Flake material transfer	Flake baghouse, Mikropulsaire, 100 bag, 7,000 cfm
Packaging material transfer	Packaging baghouse No. 1, Mikropulsaire, 9 Bag, 630 cfm
Packaging material transfer	Packaging baghouse No. 2, Mikropulsaire, 25 bag, 1,750 cfm
Crush-room material transfer	Crush-room baghouse No. 1, Mikropulsaire, 9 bag, 630 cfm
Crush-room material transfer	Crush-room baghouse No. 2, Mikropulsaire, 25 bag, 1,750 cfm
Dehydration steam peeler, Odenberg, 5,000 lb/hr output	None

[6/8/2012]

## Emissions Limits

### 4.3 Emission Limits

The PM<sub>10</sub> emissions from any stack, baghouse, flaker, peeler, or cyclone listed in Table 5.1 shall not exceed the corresponding emissions rate limits listed in Table 5.1.

## Operating Requirements

### 4.4 Throughput Limits

The maximum daily throughput of potato material on a dry basis for each process identified in Table 4.2 shall not exceed the corresponding daily limits listed in Table 4.2. The maximum annual throughput of potato material on a dry basis for each process identified in Table 4.2 shall not exceed the corresponding annual limits listed in Table 4.2 in any consecutive 12-month period.

**Table 4.2 Potato Material Throughput Limits**

Source Description	Throughput Limit Tons per Day	Throughput Limit Tons per Year
Processing peeler exhaust, Odenburg	60	21,900
Flaker Nos. 1 - 5, Blau-Knox	66	24,090
Dehydration steam peeler, Odenberg	60	21,900

**4.5 Baghouse Use Requirement**

The particulate emissions from each material transfer operation identified in Table 4.1 shall be controlled by the corresponding, properly operating baghouse at all times while the material transfer process is in operation.

**4.6 Baghouse Pressure Drop**

The permittee shall install, calibrate, maintain, and operate, in accordance with manufacturer specifications, equipment to measure the pressure differential across each air pollution control device.

The pressure drop across each baghouse shall be maintained within manufacturer and Operation and Maintenance (O&M) manual specifications. Documentation of the operating pressure drop specifications for each baghouse shall remain onsite at all times and shall be made available to DEQ representatives upon request.

The pressure drop reading across each baghouse shall be monitored and recorded once per week when operating. A compilation of the most recent five years of records shall be kept onsite and shall be made available to DEQ representatives upon request.

**Monitoring and Recordkeeping Requirements**

**4.7 Monitor Operating Parameters**

The permittee shall monitor and record daily, when operating, the throughput on a dry basis of each of the sources listed in Table 4.2 in tons per day. The permittee shall compile daily throughput data and record annual throughput monthly. The annual throughput shall be calculated by adding the current month throughput to the total throughput of the previous consecutive 11 months period. A compilation of the most recent five years of records shall be kept onsite and shall be made available to DEQ representatives upon request.

[6/8/2012]

**4.8 Operations and Maintenance Manual Requirements**

The permittee shall have developed an O&M manual for the following baghouses: grinding circuit No. 1 baghouse, grinding circuit No. 2 baghouse, flake baghouse, packaging baghouse No. 1, packaging baghouse No. 2, crush-room baghouse No. 1, and crush-room baghouse No. 2. The O&M manual shall describe the procedures that will be followed to comply with General Provision 2 and the manufacturer specifications for the baghouse. The manual shall contain, at a minimum, requirements for monthly inspections of the baghouse during each month of operation. The inspections shall include but not be limited to checking the bags for structural integrity and that they are appropriately secured in place. The manual shall remain on site at all times and shall be made available to DEQ representatives upon request.

[6/8/2012]

## 5. SUMMARY OF EMISSION RATE LIMITS

Table 5.1 PM<sub>10</sub> Emission Limits a

Source Description	PM <sub>10</sub> <sup>b</sup>	
	lb/hr <sup>c</sup>	T/yr <sup>d</sup>
East processing boiler	0.4	1.74
West processing boiler	0.30	1.32
Flaker Nos. 1 – 5	16.7	73.11
Dehydration air dryer No. 1 A stage	1.47	6.4
Dehydration air dryer No. 2 A stage	1.47	6.4
Dehydration air dryer No. 3 A stage	1.47	6.4
Dehydration air dryer No. 5 A stage	1.78	7.8
Dehydration air dryer No. 6 A stage	0.67	---
Dehydration air dryer No. 6 B stage	0.15	---
Dehydration air dryer No. 6 C stage	0.15	---

- a) In absence of any other credible evidence, compliance is assured by complying with permit operating, monitoring, and record keeping requirements.
- b) Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.
- c) Pounds per hour, as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference test method, continuous emission monitoring system (CEMS) data, or DEQ-approved alternative.
- d) Tons per any consecutive 12-calendar month period.

[1/28/2016]

## 6. GENERAL PROVISIONS

### General Compliance

- 6.1 The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the “Rules for the Control of Air Pollution in Idaho.” The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit, the “Rules for the Control of Air Pollution in Idaho,” and the Environmental Protection and Health Act (Idaho Code §39-101, et seq.)
- [Idaho Code §39-101, et seq.]
- 6.2 The permittee shall at all times (except as provided in the “Rules for the Control of Air Pollution in Idaho”) maintain in good working order and operate as efficiently as practicable all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.
- [IDAPA 58.01.01.211, 5/1/94]
- 6.3 Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules, and regulations.
- [IDAPA 58.01.01.212.01, 5/1/94]

### Inspection and Entry

- 6.4 Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:
- Enter upon the permittee’s premises where an emissions source is located, emissions-related activity is conducted, or where records are kept under conditions of this permit;
  - Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
  - Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.
- [Idaho Code §39-108]

### Construction and Operation Notification

- 6.5 This permit shall expire if construction has not begun within two years of its issue date, or if construction is suspended for one year.
- [IDAPA 58.01.01.211.02, 5/1/94]
- 6.6 The permittee shall furnish DEQ written notifications as follows:
- A notification of the date of initiation of construction, within five working days after occurrence; except in the case where pre-permit construction approval has been granted then notification shall be made within five working days after occurrence or within five working days after permit issuance whichever is later;
  - A notification of the date of any suspension of construction, if such suspension lasts for one year or more;
  - A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date; and

- A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
- A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211.03, 5/1/94]

## Performance Testing

- 6.7 If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.
- 6.8 All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.
- 6.9 Within 60 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/00 and 4/11/15]

## Monitoring and Recordkeeping

- 6.10 The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Monitoring records 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 58.01.01.211, 5/1/94]

## Excess Emissions

- 6.11 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130–136 for excess emissions due to start-up, shut-down, scheduled maintenance, safety measures, upsets, and breakdowns.

[IDAPA 58.01.01.130–136, 4/5/00]

## **Certification**

6.12 All documents submitted to DEQ—including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification—shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

[IDAPA 58.01.01.123, 5/1/94]

## **False Statements**

6.13 No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

## **Tampering**

6.14 No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

## **Transferability**

6.15 This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

[IDAPA 58.01.01.209.06, 4/11/06]

## **Severability**

6.16 The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

[IDAPA 58.01.01.211, 5/1/94]