



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

July 27, 2018

Brent Struhs, Factory Manager
Blackfoot Facility of Basic American Foods
415 W Collins Rd.
Blackfoot, ID 83221

RE: Facility ID No. 011-00012, Blackfoot Facility of Basic American Foods, Blackfoot, Final Permit Letter

Dear Mr. Struhs:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2009.0043 Project 61536 to Blackfoot Facility of Basic American Foods located at Blackfoot for PTC Modification (FEC PTC conversion to standard PTC). 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 June 8, 2015 (as well as information received on numerous subsequent dates) and on all relevant comments received on DEQ's proposed permit during the public comment period.

This permit is effective immediately and replaces PTC No. P-2009.0043, issued on January 20, 2011. This permit does not release Blackfoot Facility of Basic American Foods 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. Since DEQ is currently processing a Tier I permit renewal application for this facility, this PTC will be incorporated into your draft Tier I permit.

Pursuant to the Construction and Operation Notification General Provision of your permit, it is required that construction and operation notification be provided. Please provide this information as listed to DEQ's Pocatello Regional Office, 444 Hospital Way, #300 Pocatello, ID 83201 Fax (208) 236-6168.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Clay Gentry, Air Quality Inspector, 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 Will Tiedemann at (208) 373-0502 or William.Tiedemann@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,



for, Mike Simon
Stationary Source Program Manager
Air Quality Division

MS\wt

Permit No. P-2009.0043 PROJ 61536

Enclosures

Air Quality

PERMIT TO CONSTRUCT

Permittee	Blackfoot Facility of Basic American Foods
Permit Number	P-2009.0043
Project ID	61536
Facility ID	011-00012
Facility Location	415 W. Collins Rd. 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 the 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; and (g) in no manner implies or suggests that the Idaho 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 July 27, 2018



Will Tiedemann, Permit Writer



Mike Simon, Stationary Source Manager

per,

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1 Permit Scope

Purpose

- 1.1 This is a modified permit to construct (PTC) to remove the Facility Emissions Cap (FEC) permit conditions requirements. Additionally, changes outlined in the DEQ approved Revised Alternative Compliance Plan (Content Manager Record Number 2017AAG1588) submitted by the facility August 1, 2017 and received by DEQ August 4, 2017 are formally incorporated.
- 1.2 Those permit conditions that have been modified or revised by this permitting action are identified by the permit issue date citation located directly under the permit condition and on the right-hand margin.
- 1.3 This PTC replaces Permit to Construct No. P-2009.0043, issued on January 20, 2011.

Regulated Sources

- 1.4 Table 1 lists all sources of regulated emissions in this permit.

Table 1 Regulated Sources

Permit Section	Source	Control Equipment
Process A		
3	<u>DHQ</u> : Cooler	None
	<u>DHT</u> : Dryer - 7 MMBtu/hr, natural gas-fired	None
	<u>DHU</u> : Dryer - 7 MMBtu/hr, natural gas-fired	None
	<u>DHZ</u> : Dryer - 6 MMBtu/hr, steam heated and natural gas-fired	None
Process B		
4	<u>DUQ</u> : Dryer - 7 MMBtu/hr, natural gas-fired	None
	<u>DUT</u> : Dryer - 7 MMBtu/hr, natural gas-fired	None
	<u>DUV</u> : Dryers – Two, each rated at 6 MMBtu/hr, steam heated and natural gas-fired	None
	<u>DQA</u> : Dryer - 7 MMBtu/hr, natural gas-fired	None
	<u>DQB</u> : Dryer - 7 MMBtu/hr, natural gas-fired	None

Table 1 Regulated Sources (Continued)

Process C		
5	<u>CIR</u> : Dryer – Steam heated	AAF International RotoClone W (Wet Dust Collector)
	<u>CXX/CYY</u> : Dryer – 6.05 MMBtu/hr pre-heater, 4.4 MMBtu/hr front dryer, 6.6 MMBtu/hr rear dryer, all natural gas-fired	None
	<u>CHX</u> : Dryer – 10.3 MMBtu/hr, steam heated and natural gas-fired, with a 2.9 MMBtu/hr pre-heater, natural gas-fired	None
	<u>HEB</u> : Dryer - 6 MMBtu/hr, natural gas-fired	None
	<u>CBB</u> : Dryer – 1.5 MMBtu/hr, natural gas-fired	None
	<u>CNV</u> : Dryer - 12 MMBtu/hr, natural gas-fired	None
	<u>CNW</u> : Dryer - 12 MMBtu/hr, natural gas-fired	None
	<u>CTU</u> : Dryer – Steam heated	None
	<u>CTZ</u> : Dryer – 5.75 MMBtu/hr, natural gas-fired	Low-NO _x /CO burner
6	Plant Space Heaters (Air Makeup Units)	None

[07/27/2018]

2 Facility-Wide Conditions

2.1 Facility-Wide Requirements

Reserved (The Tier I operating permit contains facility-wide conditions that apply to this facility.)

3 Process A

3.1 Process Description

The following is a narrative description of Process A regulated in this Permit to Construct. This description is for informational purposes only.

Process A produces dehydrated potato products. The raw materials put into the process are cooked potatoes and food additives, including sulfites. Process A can operate up to 8,760 hr/yr. There are no alternate operating scenarios.

Emissions units included in Process A include process vents from process equipment. All emissions units associated with this process are potential sources of particulate matter. However, only sources from Process A that require a PTC are regulated under this permit. The drying unit processes can potentially emit SO₂ from the decomposition of sulfites. Drying heat is provided by both natural gas combustion and steam produced by the plant's boilers.

This process was constructed in the early 1960s.

[07/27/2018]

3.2 Control Device Descriptions

Table 3.1 Process A Description

Emissions Units / Processes	Control Devices	Emission Points
Process A: DHQ-cooler DHT -dryer (7 MMBtu/hr natural gas-fired) DHU -dryer (7 MMBtu/hr natural gas-fired) DHZ -dryer (6 MMBtu/hr steam and natural gas-fired)	None	DHQ stack DHT stack DHU stack DHZ stack

[7/27/2018]

Emission Limits

3.3 Emission Limits

The emissions from the following Process A stacks shall not exceed any corresponding emission limits listed in Table 3.2.

Table 3.2 Process A Emission Limits ^(a)

Source Description	PM ₁₀ /PM _{2.5} ^(b)		NO _x		SO ₂		CO	
	lb/day ^(e)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)
DHQ stack	10.82	1.38						
DHT stack	39.60	5.06	0.54	2.36	0.09	0.30	2.80	12.26
DHU stack	39.60	5.06	0.54	2.36	0.09	0.30	2.80	12.26
DHZ stack	59.76	7.63	0.31	1.34	0.16	0.52	1.56	6.83

- a In absence of any other credible evidence, compliance is ensured 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 and two and a half (2.5) 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.
- e Pounds per daily 2-hour production period

[7/27/2018]

3.4 Opacity Limit

Emissions from the pre-dryer stack and dryer stack, or any other stack, vent, or functionally equivalent opening associated with the Process A, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

[7/27/2018]

Operating Requirements

3.5 Dryer Fuels

Each dryer shall combust only natural gas or be heated by steam from the plant boilers.

[7/27/2018]

3.6 Process Identification

Each emission unit listed in Table 3.1 shall be identified by signs posted on or near each cooler or dryer. The signage shall identify the emission unit as listed in Table 3.1, and shall indicate the equipment is part of Process A.

[7/27/2018]

Monitoring and Recordkeeping Requirements

3.7 Dried Food Products Throughput Monitoring

The permittee shall monitor and record on a daily basis, the calendar date and the product throughput of dried food products, including additives, (known as "Production from New Inputs"), in pounds per day, from each Process A emission unit when in operation. Records shall be maintained on site for the most recent five-year period and shall be made available to DEQ representatives upon request.

[7/27/2018]

3.8 PM_{2.5} and PM₁₀ Compliance Demonstration

3.8.1 In order to demonstrate compliance with the daily and yearly PM₁₀ and PM_{2.5} emission limits contained in Table 3.2 the permittee shall calculate PM₁₀ and PM_{2.5} emissions by multiplying an approved production based emission factor by the associated throughput, in accordance with the following formula:

$$E_i = EF_i * P_i$$

Where:

E_i = emissions, lb from stack i for the calculation period

EF_i = emission factor for stack i, lb pollutant/1000 lb finished product

P = thousands of pounds of throughput for the calculation period

3.8.2 Compliance with the annual limits shall be based on a rolling 12-month average. Each month shall be a calendar month.

3.8.3 Compliance with the daily limits shall be based on pounds per daily production period. Daily production records may be maintained on a work-day basis, in which a work day commences at a specific time of day and lasts for 24 consecutive hours.

3.8.4 Emission factors for each stack shall be determined from the most recent performance test for each stack or as otherwise approved by DEQ.

3.8.5 PM_{10} and $PM_{2.5}$ emission records and calculations shall be maintained on site for the most recent five-year period and shall be made available to DEQ representatives upon request.

[7/27/2018]

4 Process B

4.1 Process Description

The following is a narrative description of Process B regulated in this Permit to Construct. This description is for informational purposes only.

Process B produces dehydrated potato products. The raw materials put into the process are cooked potatoes and food additives, including sulfites. Process B can operate up to 8,760 hr/yr. There are no alternate operating scenarios.

Emissions units included in Process B include process vents from process equipment. All emissions units associated with this process are potential sources of particulate matter. However, only sources from Process B that require a PTC are regulated under this permit. The drying unit processes can potentially emit SO₂ from the decomposition of sulfites. Drying heat is provided by both natural gas combustion and steam produced by the plant's boilers.

This process was constructed in the early 1960s.

[7/27/2018]

4.2 Control Device Descriptions

Table 4.1 Process B Description

Emissions Units / Processes	Control Devices	Emission Points
Process B: DUQ - dryer (7 MMBtu/hr natural gas-fired) DUT - dryer (7 MMBtu/hr natural gas-fired) , DUV - 2 dryers (6 MMBtu/hr each, steam and natural gas-fired) DQA - dryer (7 MMBtu/hr natural gas-fired) DQB - dryer (7 MMBtu/hr natural gas-fired)	None	DUQ stack DUT stack DUV stack DQA stack DQB stack

[7/27/2018]

Emission Limits

4.3 Emission Limits

The emissions from the following Process B stacks shall not exceed any corresponding emission limits listed in Table 4.2.

Table 4.2 Process B Emission Limits ^(a)

Source Description	PM ₁₀ /PM _{2.5} ^(b)		NO _x		SO ₂		CO	
	lb/day ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)
DUQ stack	39.60	5.06	0.54	2.36	0.09	0.30	2.80	12.26
DUT stack	39.60	5.06	0.54	2.36	0.09	0.30	2.80	12.26
DUV stack	28.02	3.58	0.61	2.68	0.33	1.05	3.12	13.67
DQA stack	39.60	5.06	0.54	2.36	0.09	0.30	2.80	12.26
DQB stack	39.60	5.06	0.54	2.36	0.09	0.30	2.80	12.26

- a In absence of any other credible evidence, compliance is ensured 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 and two and a half (2.5) 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.
- e Pounds per daily 24-hour production period

[7/27/2018]

4.4 Opacity Limit

Emissions from the pre-dryer stack and dryer stack, or any other stack, vent, or functionally equivalent opening associated with Process B, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

[7/27/2018]

Operating Requirements

4.5 Dryer Fuels

Each dryer shall combust only natural gas or be heated by steam from the plant boilers.

[7/27/2018]

4.6 Process Identification

Each emission unit listed in Table 4.1 shall be identified by signs posted on or near each dryer. The signage shall identify the emission unit as listed in Table 4.1, and shall indicate the equipment is part of Process B.

[7/27/2018]

Monitoring and Recordkeeping Requirements

4.7 Dried Food Products Throughput Monitoring

The permittee shall monitor and record on a daily basis, the calendar date and the product throughput of dried food products, including additives, (known as "Production from New Inputs"), in pounds per day, from each Process B emission unit when in operation. Records shall be maintained on site for the most recent five-year period and shall be made available to DEQ representatives upon request.

[7/27/2018]

4.8 PM_{2.5} and PM₁₀ Compliance Demonstration

4.8.1 In order to demonstrate compliance with the daily and yearly PM₁₀ and PM_{2.5} emission limits contained in Table 4.2 the permittee shall calculate PM₁₀ and PM_{2.5} emissions by multiplying an approved production based emission factor by the associated throughput, in accordance with the following formula:

$$E_i = EF_i * P_i$$

Where:

E_i = emissions, lb from stack i for the calculation period

EF_i = emission factor for stack i , lb pollutant/1000 lb finished product

P = thousands of pounds of throughput for the calculation period

4.8.2 Compliance with the annual limits shall be based on a rolling 12-month average. Each month shall be a calendar month.

4.8.3 Compliance with the daily limits shall be based on pounds per daily production period. Daily production records may be maintained on a work-day basis, in which a work day commences at a specific time of day and lasts for 24 consecutive hours.

4.8.4 Emission factors for each stack shall be determined from the most recent performance test for

each stack or as otherwise approved by DEQ.

- 4.8.5 PM_{10} and $PM_{2.5}$ emission records and calculations shall be maintained on site for the most recent five-year period and shall be made available to DEQ representatives upon request.

[7/27/2018]

5 Process C

5.1 Process Description

The following is a narrative description of Process C regulated in this Permit to Construct. This description is for informational purposes only.

Process C produces dehydrated food products. The raw materials put into the process include raw and cooked foods, previously dehydrated foods, and food additives, including sulfites. Process C can operate up to 8,760 hr/yr. There are no alternate operating scenarios.

Emissions units included in Process C include process vents from process equipment. All emissions units associated with this process are potential sources of particulate matter. However, only sources from Process C that require a PTC are regulated under this permit. The process equipment can potentially emit SO₂ from the decomposition of sulfites. Drying heat is provided by steam produced by the plant's boilers and natural gas-fired heaters.

[7/27/2018]

5.2 Control Device Descriptions

Table 5.1 Process C Description

Emissions Units / Processes	Control Devices	Emission Points
<u>CIR</u> : Dryer – Steam heated	RotoClone W (Wet Dust Collector)	CIR stack
<u>CXX/CYY</u> : Dryer –6.05 MMBtu/hr pre-heater, 4.4 MMBtu/hr front dryer, 6.6 MMBtu/hr rear dryer, all natural gas-fired <u>CHX</u> : Dryer – 10.3 MMBtu/hr, steam heated and natural gas-fired, with a 2.9 MMBtu/hr pre-heater, natural gas-fired <u>HEB</u> : Dryer - 6 MMBtu/hr, natural gas-fired <u>CBB</u> : Dryer – 1.5 MMBtu/hr, natural gas-fired <u>CNV</u> : Dryer - 12 MMBtu/hr, natural gas-fired <u>CNW</u> : Dryer - 12 MMBtu/hr, natural gas-fired <u>CTU</u> : Dryer – Steam heated	None	CXX stack CYY stack CHX stack HEB stack CBB stack CNV stack CNW stack CTU stack
<u>CTZ</u> : Dryer – 5.75 MMBtu/hr, natural gas-fired	Low-NO _x /CO burner	CTZ stack

[7/27/2018]

Emission Limits

5.3 Emission Limits

The emissions from the following Process C stacks shall not exceed any corresponding emission limits listed in Table 5.2.

Table 5.2 Process C Emission Limits ^(a)

Source Description	PM ₁₀ /PM _{2.5} ^(b)		NO _x		SO ₂		CO	
	lb/day ^l	T/yr ^(d)	lb/hr ^l	T/yr ^(d)	lb/hr ^l	T/yr ^(d)	lb/hr ^l	T/yr ^(d)
CIR stack	12.24	1.72			1.21	4.10		
CXX stack	56.64	7.51	0.58	2.55	0.42	1.38	2.73	11.95
CYY stack	54.00	7.16	0.35	1.54	0.44	1.42	2.35	10.30
CHX stack	14.64	1.49	0.61	2.66	0.08	0.23	1.42	6.23
HEB stack	51.12	6.17	0.29	1.27	0.37	1.10	0.46	2.03
CBB stack	6.00	0.79	0.08	0.34	0.11	0.36	0.39	1.71
CNV stack	6.72	0.58	0.61	2.68	0.07	0.21	3.12	13.67
CNW stack	6.72	0.59	0.61	2.68	0.07	0.21	3.12	13.67
CTU stack	45.36	3.96			0.25	0.52		
CTZ stack	11.52	1.00	0.13	0.55	0.14	0.36	0.15	0.67

- a In absence of any other credible evidence, compliance is ensured 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 and two and a half (2.5) 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.
- e Pounds per daily 24-hour production period

[7/27/2018]

5.4 Opacity Limit

Emissions from the pre-dryer stack and dryer stack, or any other stack, vent, or functionally equivalent opening associated with the Process A shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

[7/27/2018]

Operating Requirements

5.5 Dryer Fuels

Each dryer shall combust only natural gas or be heated by steam from the plant boilers.

[7/27/2018]

5.6 Process Identification

Each emission unit listed in Table 5.1 shall be identified by signs posted on or near each dryer. The signage shall identify the emission unit as listed in Table 5.1, and shall indicate the equipment is part of Process C.

[7/27/2018]

5.7 Control Device Requirements

The Permittee shall use and maintain an AAF International, RotoClone W (Wet Dust Collector) on Emission Source CIR in accordance with manufacture's written instructions.

[7/27/2018]

Monitoring and Recordkeeping Requirements

5.8 Dried Food Products Throughput Monitoring

The permittee shall monitor and record on a daily basis, the calendar date and the product throughput of dried food products, including additives, (known as “Production from New Inputs”), in pounds per day, from each Process C emission unit when in operation. Records shall be maintained on site for the most recent five-year period and shall be made available to DEQ representatives upon request.

[7/27/2018]

5.9 PM_{2.5} and PM₁₀ Compliance Demonstration

5.9.1 In order to demonstrate compliance with the daily and yearly PM₁₀ and PM_{2.5} emission limits contained in Table 5.2 the permittee shall calculate PM₁₀ and PM_{2.5} emissions by multiplying an approved production based emission factor by the associated throughput, in accordance with the following formula:

$$E_i = EF_i * P_i$$

Where:

E_i = emissions, lb from stack I for the calculation period

EF_i = emission factor for stack I, lb pollutant/1000 lb finished product

P = thousands of pounds of throughput for the calculation period

5.9.2 Compliance with the annual limits shall be based on a rolling 12-month average. Each month shall be a calendar month.

5.9.3 Compliance with the daily limits shall be based on pounds per daily production period. Daily production records may be maintained on a work-day basis, in which a work day commences at a specific time of day and lasts for 24 consecutive hours.

5.9.4 Emission factors for each stack shall be determined from the most recent performance test for each stack or as otherwise approved by DEQ.

5.9.5 PM₁₀ and PM_{2.5} emission records and calculations shall be maintained on site for the most recent five-year period and shall be made available to DEQ representatives upon request.

[7/27/2018]

6 Plant Space Heaters (Air Makeup Units)

6.1 Process Description

The BAF Blackfoot Facility has natural gas-fired space heaters/air make up units ranging in size from less than 200,000 Btu/hr to 13.5 MMBtu/hr. At the time of permit issuance, total space heater combustion capacity is 77.6 MMBtu/hr. Most of the units provide direct heating; i.e., the combustion air from the unit is discharged directly into the facility to provide heating (See Appendix A for heat rating of all plant space heaters (air make up units)).

[7/27/2018]

6.2 Emission Control Description

Table 6.1 Plant Space Heaters Description

Emissions Unit(s)/Processes	Emission Control Device
Plant Space Heaters (combined) - 77.6 MMBtu/hr, natural gas-fired	None

[7/27/2018]

Emission Limits

6.3 Emission Limits

The emissions from the Plant Space Heaters (Air Makeup Units) stack shall not exceed any corresponding emissions rate limits listed in Table 7.1.

Table 6.2 Plant Space Heaters Emission Limits^(a)

Source Description	PM ₁₀ /PM _{2.5} ^(b)	
	lb/day ^(c)	T/yr ^(d)
Plant Space Heaters (AMUs) ^(e) (combined)	13.92	1.27

- a In absence of any other credible evidence, compliance is ensured 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 daily 24-hour production period
- d Tons per any consecutive 12-calendar month period.
- e Emission limits for use of plant space heaters (air makeup units) is for a combined total from all gas fired space heaters.

[7/27/2018]

Monitoring and Recordkeeping Requirements

6.4 PM₁₀ and PM_{2.5} Compliance Demonstration

In order demonstrate compliance with PM₁₀/PM_{2.5} 1.27 T/yr emission limit in permit condition 6.3 the permittee shall determine the total natural gas usage of the plant space heaters (air makeup units) on a monthly basis. The annual limit shall be based on a rolling 12-month average where each month shall be a calendar month. Natural gas combustion in the plant space heaters (air makeup units) will be calculated as the difference between the total facility natural gas usage less natural gas usage combusted from Process A, B, and C as well as facility boilers and Production Line C-8 (see permits P-2017.0031 and P-2017.0011). Emissions calculations shall use only DEQ approved emission factors or methods. Records shall be maintained on site for the most recent five-year period and shall be made available to DEQ representatives upon request.

[7/27/2018]

7 General Provisions

General Compliance

7.1 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.]

7.2 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]

7.3 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

7.4 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

7.5 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]

7.6 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

- 7.7 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.
- 7.8 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.
- 7.9 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

- 7.10 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

- 7.11 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

- 7.12 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

- 7.13 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

- 7.14 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

- 7.15 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

- 7.16 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]