Idahoan Foods, LLC
P.O. Box 130 529 North 3500 East Lewisville, Idaho 83431
208.754.4686 800.635.6100 www.idahoan.com

RECEIVED
APR 16 2012
DEPARTMENT OF ENVIRONMENTAL QUALITY
STATE A.Q. PROGRAM

Date: 4/11/2012
From: Idahoan Foods, LLC, Idaho Falls, Facility ID# 019-00038
Subject: Request for Permit modification
To: Idaho Department of Environmental Quality
Bill Rogers
1410 North Hilton, Boise, ID 83706

Bill,

Idahoan is replacing the 3 Proctors with 3 newer ones, and adding an additional Drum Dryer. The new Proctors will have a much higher production rates than those they are replacing. Currently there are no Emissions Controls. We will be adding Cyclones and Bag Houses to the process. We need to modify our permit to show these changes.

We plan on completing the switch by Aug 15, 2012

8760 run hours per year

A check for $1,000 in enclosed for processing fee.

Other attachments: Forms, CSPTC, FRA, GI
Form BCE will come later.

Thank you,

Leo Herbert

~Leo Herbert~
Corporate Environmental Manager
Idahoan Foods, LLC
208-754-8194
lherbert@Idahoan.com

RECEIVED
APR 16 2012
DEPARTMENT OF ENVIRONMENTAL QUALITY
STATE A.Q. PROGRAM

DEQ AIR QUALITY PROGRAM
1410 N. Hilton, Boise, ID 83706
For assistance, call the
Air Permit Hotline – 1-877-5PERMIT

Cover Sheet for Air Permit Application – Permit to Construct **Form CSPTC**

Please see instructions on page 2 before filling out the form.

COMPANY NAME, FACILITY NAME, AND FACILITY ID NUMBER

1. Company Name	Idahoan Foods, LLC		
2. Facility Name	Idaho Falls Facility	3. Facility ID No.	019-00038
4. Brief Project Description - One sentence or less	Increasing Production Rate & adding Baghouses		

PERMIT APPLICATION TYPE

5. ☐ New Source ☐ New Source at Existing Facility ☐ PTC for a Tier I Source Processed Pursuant to IDAPA 58.01.01.209.05.c
☐ Unpermitted Existing Source ☐ Facility Emissions Cap ☒ Modify Existing Source: Permit No.: T2-2009.0027 Date Issued: 5/9/08
☐ Required by Enforcement Action: Case No.:____

6. ☒ Minor PTC ☐ Major PTC

FORMS INCLUDED

Included	N/A	Forms		DEQ Verify
☐	☐	Form CSPTC – Cover Sheet		☐
☒	☐	Form GI – Facility Information		☐
☐	☐	Form EU0 – Emissions Units General		☐
☐	☐	Form EU1– Industrial Engine Information	Please specify number of EU1s attached: ____	☐
☐	☐	Form EU2– Nonmetallic Mineral Processing Plants	Please specify number of EU2s attached: ____	☐
☐	☐	Form EU3– Spray Paint Booth Information	Please specify number of EU3s attached: ____	☐
☐	☐	Form EU4– Cooling Tower Information	Please specify number of EU3s attached: ____	☐
☐	☐	Form EU5 – Boiler Information	Please specify number of EU4s attached: ____	☐
☐	☐	Form CBP– Concrete Batch Plant	Please specify number of CBPs attached: ____	☐
☐	☐	Form HMAP – Hot Mix Asphalt Plant	Please specify number of HMAPs attached: ____	☐
☐	☐	PERF – Portable Equipment Relocation Form		☐
☐	☐	Form AO – Afterburner/Oxidizer		☐
☐	☐	Form CA – Carbon Adsorber		☐
☐	☐	Form CYS – Cyclone Separator		☐
☐	☐	Form ESP – Electrostatic Precipitator		☐
☒	☐	Form BCE– Baghouses Control Equipment		☐
☐	☐	Form SCE– Scrubbers Control Equipment		☐
☐	☐	Form VSCE – Venturi Scrubber Control Equipment		☐
☐	☐	Form CAM – Compliance Assurance Monitoring		☐
☐	☐	Forms EI-– Emissions Inventory		☐
☐	☐	PP – Plot Plan		☐
☐	☐	Forms MI1 – MI4 – Modeling	(Excel workbook, all 4 worksheets)	☐
☒	☐	Form FRA – Federal Regulation Applicability		☐

DEQ AIR QUALITY PROGRAM
1410 N. Hilton, Boise, ID 83706
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Air Permit Hotline – 1-877-5PERMIT

General Information **Form GI**
Revision 7
2/18/10

Please see instructions on page 2 before filling out the form.

All information is required. If information is missing, the application will not be processed.

IDENTIFICATION

1. Company Name	2. Facility Name:
Idahoan Foods, LLC	Idaho Falls Facility

3. Brief Project Description:	Old Permit is expiring We are replacing old equipment and replacing with newer higher production throughput machines

FACILITY INFORMATION

4. Primary Facility Permit Contact Person/Title	Dan Huff		Plant Manager	
5. Telephone Number and Email Address	208-754-8196		dhuff@idahoan.com	
6. Alternate Facility Contact Person/Title	Leo Herbert		Corporate Environmental Manager	
7. Telephone Number and Email Address	208-754-8194		lherbert@idahoan.com	
8. Address to Which the Permit Should be Sent	P.O. Box 130, 529 N. 3500 E.			
9. City/County/State/Zip Code	Lewisville	Jefferson	ID	83431
10. Equipment Location Address (if different than the mailing address above)	6140 West River Road			
11. City/County/State/Zip Code	Idaho Falls	Bonneville	ID	83402
12. Is the Equipment Portable?	☐ Yes ☒ No			
13. SIC Code(s) and NAICS Code	Primary SIC: 2034	Secondary SIC:	NAICS: 311423	
14. Brief Business Description and Principal Product	Dehydrated Potato Processing			
15. Indentify any adjacent or contiguous facility that this company owns and/or operates	none			
16. Specify the reason for the application	☒ Permit to Construct (PTC) For Tier I permitted facilities only: If you are applying for a PTC then you must also specify how the PTC will be incorporated into the Tier I permit. ☐ Incorporate the PTC at the time of the Tier I renewal ☐ Co-process the Tier I modification and PTC ☐ Administratively amend the Tier I permit to incorporate the PTC upon your request (IDAPA 58.01.01.209.05.a, b, or c) ☐ Tier I Permit ☐ Tier II Permit ☐ Tier II/Permit to Construct			

CERTIFICATION

In accordance with **IDAPA 58.01.01.123 (Rules for the Control of Air Pollution in Idaho), I** certify based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

17. Responsible Official's Name/Title	Leo Herbert	Corporate Environmental Manager	
18. Responsible Official Address	P. O. Box 130 Lewisville, ID 83431		
19. Responsible Official Telephone Number	208-754-8194		
20. Responsible Official Email Address	lherbert@idahoan.com		
21. Responsible Official's Signature	Leo Herbert	Date:	4/11/12

22. ☒ Check here to indicate that you would like to review the draft permit prior to final issuance.

DEQ AIR QUALITY PROGRAM
1410 N. Hilton, Boise, ID 83706
For assistance, call the
Air Permit Hotline – 1-877-5PERMIT

AIR PERMIT APPLICATION

Revision 6
10/7/09

For each box in the table below, CTRL+click on the blue underlined text for instructions and information.

IDENTIFICATION	
1. Company Name:	2. Facility Name:
Idahoan Foods, LLC	Idaho Falls Facility
3. Brief Project Description:	Facility Equepment Upgrade and product throughput increase

APPLICABILITY DETERMINATION	
4. List applicable subparts of the New Source Performance Standards (NSPS) (40 CFR part 60). Examples of NSPS affected emissions units include internal combustion engines, boilers, turbines, etc. The applicant must thoroughly review the list of affected emissions units.	List of applicable subpart(s): ☒ Not Applicable
5. List applicable subpart(s) of the National Emission Standards for Hazardous Air Pollutants (NESHAP) found in 40 CFR part 61 and 40 CFR part 63. Examples of affected emission units include solvent cleaning operations, industrial cooling towers, paint stripping and miscellaneous surface coating. EPA has a web page dedicated to NESHAP that should be useful to applicants.	List of applicable subpart(s): ☒ Not Applicable
6. For each subpart identified above, conduct a complete a regulatory analysis using the instructions and referencing the example provided on the following pages. **Note** - Regulatory reviews must be submitted with sufficient detail so that DEQ can verify applicability and document in legal terms why the regulation applies. Regulatory reviews that are submitted with insufficient detail will be determined incomplete.	☐ A detailed regulatory review is provided (Follow instructions and example). ☒ DEQ has already been provided a detailed regulatory review. Give a reference to the document including the date. Statement of Basis April 13, 2009

IF YOU ARE UNSURE HOW TO ANSWER ANY OF THESE QUESTIONS, CALL THE AIR PERMIT HOTLINE AT 1-877-5PERMIT

It is emphasized that it is the applicant's responsibility to satisfy all technical and regulatory requirements, and that DEQ will help the applicant understand what those requirements are prior to the application being submitted but that DEQ will not perform the required technical or regulatory analysis on the applicant's behalf.

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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APPENDIX A – AIRS INFORMATION

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_X	nitrogen oxides
NSPS	New Source Performance Standards
O_3	ozone
PM	Particulate Matter
PM_{10}	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_2	sulfur dioxide
TAP	Toxic Air Pollutant
T2/PTC	Tier II operating permit and permit to construct
T/yr	Tons per year
$\mu g/m^3$	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~~3.1 Origin of Existing Emissions Limits

Formatted: Bullets and Numbering

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_{10}, $PM_{2.5}$, CO, NO_2, SO_X, 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)~~ No longer applicable - Removed

~~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 Standardsfor 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_2 emitted by the facility. DEQ included a NAICS (North American Industry Classification System) code on the cover page of this permitand 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 ddeted 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