



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
Toni Hardesty, Director

March 3, 2005

Certified Mail No. 7099 3220 0009 1975 0412

Todd Sutton
Idaho Pacific Corporation
P.O. Box 478
Ririe, ID 83443

RE: Facility ID No. 051-00013, Idaho Pacific Corporation, Ririe
Final Permit Letter

Dear Mr. Sutton:

The Idaho Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) Number P-040521 for the Idaho Pacific Corporation facility in Ririe in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho). This permit is effective immediately and is based on your permit application received on August 16, 2004, as amended.

This permit does not release Idaho Pacific Corporation from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

A representative of the Idaho Falls Regional Office will contact you regarding a meeting with DEQ to discuss the permit terms and requirements. DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations 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 call Dan Pitman at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Martin Bauer, Administrator
Air Quality Division

MB/DP/sd
Enclosures

Permit No. P-040521



Air Quality
PERMIT TO CONSTRUCT
State of Idaho
Department of Environmental Quality

PERMIT No.: P-040521
FACILITY ID No.: 051-00013
AQCR: 61 CLASS: B
SIC: 2034 ZONE: 12
UTM COORDINATE (km): 437.5, 4931.0

1. **PERMITTEE**
Idaho Pacific Corporation

2. **PROJECT**
Potato Drying/Flaking Process

3. MAILING ADDRESS P. O. Box 478	CITY Ririe	STATE ID	ZIP 83443
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4. FACILITY CONTACT Todd Sutton	TITLE Vice President of Operations	TELEPHONE 208-538-6971
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5. RESPONSIBLE OFFICIAL Todd Sutton	TITLE Vice President of Operations	TELEPHONE 208-538-6971
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6. EXACT PLANT LOCATION 4723 E. 100 N., Ririe, Idaho	COUNTY Jefferson
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7. **GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**
Dehydrated Potato Processing Plant

8. **GENERAL CONDITIONS**

This permit is issued according to IDAPA 58.01.01.200, Rules for the Control of Air Pollution in Idaho, and 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.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) 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; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) 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.

This permit is not transferable to another person, place, or piece or set of equipment. This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented with its application. Changes of design or equipment may require DEQ approval pursuant to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200, et seq.



TONI HARDESTY, DIRECTOR
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: March 3, 2005

Acronyms, Units, and Chemical Nomenclature

acfm	actual cubic feet per minute
AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
Btu	British thermal unit
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
gr	grain (1 lb = 7,000 grains)
HAPs	hazardous air pollutants
hp	horsepower
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
m	meter(s)
MACT	Maximum Achievable Control Technology
MMBtu	million British thermal units
NESHAP	Nation Emission Standards for Hazardous Air Pollutants
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
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
scf	standard cubic feet
SIC	Standard Industrial Classification
SM	synthetic minor
SO ₂	sulfur dioxide
SO _x	sulfur oxides
T/yr	tons per year
µg/m ³	micrograms per cubic meter
UTM	Universal Transverse Mercator
VOC	volatile organic compound

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Permittee:	Idaho Pacific Corporation	Facility ID No. 051-00013	Date Issued:	March 3, 2005
Location:	Ririe			

1. PERMIT TO CONSTRUCT SCOPE***Purpose***

- 1.1 The purpose of this permit to construct (PTC) is to satisfy the requirements of IDAPA 58.01.01.200, Rules for the Control of Air Pollution in Idaho, for the potato drying/flaking process.

Regulated Sources

- 1.2 Table 1.1 lists all sources of regulated emissions in this PTC.

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Section	Source Description	Emissions Control(s)
2	4 Dryer/Flakers, drum type Manufacturer: Idaho Steel	None
2	Material Transfer System, Packaging Area	Baghouse
2	Material Transfer System, Dry Processing Area	Baghouse
2	Material Transfer System for 3 Storage Silos	Baghouse

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2. DRYER PROCESS AND MATERIAL TRANSFER SYSTEMS**2.1 Process Description**

This PTC addresses the potato flake drying process. At the beginning of the process, raw potatoes are cleaned, sorted, peeled, deskinning, and cooked. The heat/steam for these steps is provided by the boiler which is addressed under another PTC. The wet potato mash is then spread in an even thin layer across the steam heated rotating drum of each dryer. Steam from the dryers contains a small amount of entrained particulate and this is collected and exhausted from the building. A pneumatic material conveyance system with baghouse controls is used to transport dried potato product within the facility.

2.2 Emissions Control Description**Table 2.1 DRYER AND MATERIAL TRANSFER SYSTEM DESCRIPTION**

Emissions Unit(s) / Process(es)	Emissions Control Device	Emissions Point
4 Drum Dryers	None	Each Drum Dryer Stack
Material Transfer System, Packaging Area	Baghouse	Baghouse Stack
Material Transfer System, Dry Processing Area	Baghouse	Baghouse Stack
Material Transfer System for 3 Storage Silos	Baghouse	Baghouse Stack for Each Silo

Emissions Limits**2.3 Emissions Limits**

The combined emissions of PM₁₀ from the four Drum Dryer stacks shall not exceed 1.5 pounds per hour.

2.4 Opacity Limit

Emissions from any stack, vent, or functionally equivalent opening at the facility 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.

Operating Requirements**2.5 Throughput Limits**

The combined total output from all four Drum Dryers shall not exceed a rate of 117,600 pounds per day.

2.6 Material Transfer System Control Equipment

The permittee shall install, operate, and maintain baghouses to control PM emissions from each of the following material transfer systems: Packaging Area; Dry Processing Area; and each of the three Storage Silos. The pressure drop across each baghouse shall be maintained within manufacturer's and O&M manual specifications.

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2.7 Baghouse Pressure Drop

Within 90 days of issuance of this permit, the permittee shall install, calibrate, maintain, and operate pressure drop monitoring devices that measure the pressure differential across the baghouse for each of the following material transfer systems: Packaging Area; Dry Processing Area; and each of the three Storage Silos.

Monitoring and Recordkeeping Requirements**2.8 Throughput**

When in operation, the permittee shall monitor and record, on a daily basis, the calendar date and the combined total daily output, in pounds per day, from all four Drum Dryers. The sum of the total daily output of each dehydration product line may be used for this purpose. All records shall be maintained on-site for a period of at least two years and shall be made available to DEQ representatives upon request.

2.9 Visible Emissions

The permittee shall conduct a monthly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. The inspection shall consist of a see/no see evaluation for each potential source of visible emissions. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when a Method 9 opacity test is conducted. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each monthly visible emission inspection and each Method 9 opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

2.10 Baghouse Pressure Drop

When in operation, the permittee shall monitor and record, on a monthly basis, the calendar date and the pressure drop across each baghouse for the following material transfer systems: Packaging Area; Dry Processing Area; and each of the three Storage Silos. All records shall be maintained on-site for a period of at least two years and shall be made available to DEQ representatives upon request.

2.11 Baghouse O & M Manual

Within 120 days of issuance of this permit, the permittee shall have developed an O&M manual for the air pollution control equipment for each of the following material transfer systems: Packaging Area; Dry Processing Area; and the three Storage Silos. The manual shall incorporate procedures and information to demonstrate that the control equipment is operated as described in the permit application. At a minimum the following items shall be addressed in the manual:

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- The contents of the O&M manual shall be based on manufacturer's information to the extent this is practical. When the manufacturer's information is not used, this should be explained in the manual.
- List the manufacturer's recommended minimum and maximum pressure drops for each baghouse.
- An inspection checklist which lists items that will be periodically inspected while the system is operating (e.g.: condition of the air pulse system or mechanical shaker system such as hoses, air valves, linkages, timers, switches, etc; condition of the structure and sheet metal such as cracks, leaks, seal problems, etc., etc.). Describe how often these operational inspections will be performed. These inspections should be done at least monthly.
- An inspection checklist which lists items that will be inspected when the baghouse is taken out of operation and physically opened for inspection (e.g., items listed in the operational checklist plus condition of bags, bag supports, bag attachment hardware, internal pulse system or shaker hardware, condition of seals, sheet metal cracks, etc.). Describe how often these internal inspections are projected to occur.

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

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3. PERMIT TO CONSTRUCT GENERAL PROVISIONS

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 and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.
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.
3. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
 - To enter, at reasonable times, upon the premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
 - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack compliance testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.
4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
5. The permittee shall notify DEQ, in writing, of the required information for the following events within 5 working days after occurrence:
 - Initiation of Construction - Date
 - Completion/Cessation of Construction - Date
 - Actual Production Startup - Date
 - Initial Date of Achieving Maximum Production Rate - Production Rate and Date
6. The Director may require the permittee to develop a list of operation and maintenance procedures to be submitted to DEQ. Such list of procedures shall become a part of this permit by reference, and the permittee shall adhere to all of the operation and maintenance procedures contained therein.
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.

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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.

Within 30 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.

8. 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.
9. In accordance with IDAPA 58.01.01.123, 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.