



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

C.L. "Butch" Otter, Governor
Toni Hardesty, Director

September 6, 2007

Certified Mail No. 7102 0243 6844 0000 0274

Jim Englar, Unit Director
J. R. Simplot Company
P.O. Box 1059
Caldwell, Idaho 83606

RE: Facility ID No. 027-00009, J. R. Simplot Company, Caldwell, Idaho
Final Permit Letter

Dear Mr. Englar:

The Idaho Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2007.0073 to J. R. Simplot Company for the installation of the Line 4 pre-formed potato fryer at Caldwell, in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho).

This permit is based on your permit application received on April 30, 2007, and on the relevant comments received during the public comment period. This permit is effective immediately. This permit does not release J. R. Simplot Company from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

This permit to construct was processed in accordance with IDAPA 58.01.01.209.05.c. In accordance with IDAPA 58.01.01.209.05.c, you may request at any time that the PTC provisions be incorporated into the Tier I operating permit through an administrative amendment in accordance with IDAPA 58.01.01.381. In accordance with 40 CFR 70.7(d)(3)(iii), you may implement the changes authorized by the PTC immediately upon submittal of this request.

Pursuant to General Provision 5 of your permit, it is required that Construction and Operation Notification be provided. Please provide this information as listed to DEQ's Boise Regional Office, 1445 N. Orchard, Boise Idaho 83706, Fax (208) 373-0287.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Boise Regional Office Representative, Mike Toole, at (208) 373-0550 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends 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.

J. R. Simplot Company, Caldwell, Idaho
September 6, 2007
Page 2 of 3

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 Robert Baldwin at (208) 373-0502 or robert.baldwin@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Simon". The signature is written in a cursive style with a large, sweeping "M" and "S".

Mike Simon
Stationary Source Program Manager
Air Quality Division

MSREB\sd

Project No. P-2007.0073

Enclosures

J. R. Simplot Company, Caldwell, Idaho
September 6, 2007
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HARD COPY TO FACILITY

en: Leonard Herr, Boise Regional Office
Mike Toole, Boise Regional Office
Robert Baldwin, Permit Writer
Marilyn Seymore/ Pat Rayne, AQ Division
Joan Lechtenberg, AQ Public Comment

en-web: Laurie Kral, U.S. EPA Region 10

cc: Responsible Official, Jim Englar, jim.englar@simplot.com
Facility Contact, Lance Carter, lance.carter@simplot.com
Sean Williams, Geomatrix Consultants, geomatrix.com

c: Source File
Permit Binder
Bill Rogers, Permit Coordinator (Ltr Only)
Phyllis Heitman, AQ Division (Ltr Only)
Reading File (Ltr Only)



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

PERMIT No.: P-2007.0073

FACILITY ID No.: 027-00009

AQCR: 64

CLASS: A

SIC: 2037

ZONE: 11

UTM COORDINATE (km): 521.5, 4835.0

1. PERMITTEE

J. R. Simplot Company

2. PROJECT

Line 4 Fryer

3. MAILING ADDRESS

P.O. Box 1059

CITY

Caldwell

STATE

ID

ZIP

83606

4. FACILITY CONTACT

Lance Carter

TITLE

Environmental Manager

TELEPHONE

208-454-4360/208-250-6039

5. RESPONSIBLE OFFICIAL

Jim Englar

TITLE

Unit Director

TELEPHONE

208-454-4201

6. EXACT PLANT LOCATION

Two miles west of Caldwell on Highway 19

COUNTY

Canyon

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Potato Processing

8. PERMIT AUTHORITY

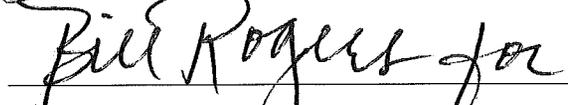
This permit is issued according to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200 through 228, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed or modified by this permit.

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 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 in design, equipment or operations may be considered a modification. Modifications are subject to DEQ review in accordance with IDAPA 58.01.01.200 through 228 of the Rules for the Control of Air Pollution in Idaho.


ROBERT BALDWIN, PERMIT WRITER
DEPARTMENT OF ENVIRONMENTAL QUALITY


MIKE SIMON, STATIONARY SOURCE PROGRAM MANAGER
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED:	September 6, 2007
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Acronyms, Units, and Chemical Nomenclature

AQCR	Air Quality Control Region
DEQ	Department of Environmental Quality
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
SIC	Standard Industrial Classification
T/yr	tons per year
UTM	Universal Transverse Mercator
WESP	wet electrostatic precipitator

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2007.0073

Permittee:	J.R. Simplot, Food Company	Facility ID No. 027-00009
Location:	Caldwell, Idaho	

1. PERMIT TO CONSTRUCT SCOPE

Purpose

1.1 This permit is the initial Permit to Construct for the change of the current Line 4 fryer from processing French fries par fried potatoes with constructing a new Line 4 fryer to process pre-formed par fried potatoes. The current Line 4 dryer used with processing French fried par fried potatoes will be removed.

Regulated Sources

1.3 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	Line 4 fryer	WESP

2. LINE 4 FRYER

2.1 Process Description

Line 4 is being changed from processing French fries to pre-formed potato products. The Line 4 dryer used with the French fry process is to be removed. The Line 4 fryer used in the French fry process is to be replaced with a new Line 4 Fryer used for pre-formed par fried potato products.

2.2 Emissions Control Description

The emissions from the Line 4 pre-formed par fried potato fryer pass through a wet electrostatic precipitator.

Table 2.1 LINE 4 FRYER UNIT

Emissions Unit(s) / Process(es)	Emissions Control Device	Emissions Point
Line 4 fryer	Wet Electrostatic Precipitator	Line 4 fryer stack

Emissions Limits

2.3 Emissions Limits

- The daily PM/PM₁₀ emissions from the Line 4 fryer stack shall not exceed 125 pounds per calendar day.
- The annual PM/PM₁₀ emissions from the Line 4 fryer stack shall not exceed 22.3 tons per calendar year.

2.4 Opacity Limit

Emissions from the Line 4 fryer stack, or any other stack, vent, or functionally equivalent opening associated with the Line 4 fryer, shall not exceed 20% opacity for a period or periods aggregating more

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Permittee:	J.R. Simplot, Food Company	Facility ID No. 027-00009
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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 maximum throughput of finished pre-formed potato product from the Line No. 4 fryer shall not exceed 47,304 tons per consecutive 12-calendar months.

2.6 Monitoring Equipment

The permittee shall have installed, calibrated, maintained, and operated, in accordance with manufacturer's specifications and recommendations, equipment to monitor the secondary voltage of the WESP, and the quench water flow rate.

2.7 Operations and Maintenance (O&M) Manual Requirements

The permittee shall have developed an O&M manual for the WESP that describes the procedures that will be followed to comply with General Provision 2 and the requirements for the WESP as contained in this permit. The O&M manual shall contain at a minimum, the following information: a general discussion of the operation of the WESP, operating procedures, normal operating ranges for the secondary voltage and the quench water flow rate, corrective action steps for when operation is not consistent with normal operating ranges, cleanup and maintenance procedures, and recordkeeping. The O&M manual shall remain on site at all times and shall be made available to DEQ representatives upon request.

The permittee shall operate the WESP system in accordance with the O&M manual.

Monitoring and Recordkeeping Requirements

2.8 Throughput Monitoring

The permittee shall monitor and record the throughput to the Line 4 fryer monthly and annually to demonstrate compliance Permit Conditions 2.3 and 2.5. The daily throughput shall be determined by the monthly throughput total divided by the number of days Line 4 operated that month. The annual throughput shall be determined by summing each monthly throughput over the previous consecutive 12-calendar month period. Records of this information shall be kept on site for the most recent five-year period and shall be made available to DEQ representatives upon request

2.9 Operating Parameters

The permittee shall monitor and record the following operating parameters once per day while the WESP is operating. Records of this information shall remain on site for the most recent five-year period and shall be made available to DEQ representatives upon request:

- The secondary voltage of the WESP
- The flow rate of the quench water system
- The quench water system shall be monitored and a daily record kept of whether the sprays are in operation and the corrective action taken when the sprays are not in operation

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Permittee: J.R. Simplot, Food Company

Location: Caldwell, Idaho

Facility ID No. 027-00009

3. PERMIT TO CONSTRUCT GENERAL PROVISIONS

General Compliance

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.

[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.

[IDAPA 58.01.01.211, 5/1/94]

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

4. Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:
- a. Enter upon the permittee's premises where an emissions source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;
 - b. Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d. 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

5. The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211:
- a. A notification of the date of initiation of construction, within five working days after occurrence;

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Permittee: J.R. Simplot, Food Company

Location: Caldwell, Idaho

Facility ID No. 027-00009

- b. A notification of the date of any suspension of construction, if such suspension lasts for one year or more;
- c. 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;
- d. A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
- e. 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, 5/1/94]

Performance Testing

6. 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.

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.

[IDAPA 58.01.01.157, 4/5/00]

Monitoring and Recordkeeping

7. The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Records of monitoring information 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 and 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]

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Excess Emissions

8. The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

[IDAPA 58.01.01.130-136, 4/5/00]

Certification

9. 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

10. 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

11. 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

12. 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

13. 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.