



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

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www.deq.idaho.gov

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

August 21, 2017

Bill Schow, General Manager  
Gem State Processing, LLC  
951 Highway 30  
Heyburn, ID 83336

RE: Facility ID No. 067-00038, Gem State Processing, LLC, Heyburn  
Final Permit Letter

Dear Mr. Schow:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2010.0183 Project 61652 to Gem State Processing, LLC located at Heyburn for potato processing facility. 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 January 21, 2016.

This permit is effective immediately and replaces PTC No. P-2010.0183, issued on March 5, 2015. This permit does not release Gem State Processing, LLC from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

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 Twin Falls Regional Office, 650 Addison Avenue West, Suite 110, Twin Falls ID 83301, Fax (208) 736-2194.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Bobby Dye, Regional Air Quality and Remediation Manager, at (208) 737-3889 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 Dan Pitman at (208) 373-0502 or [daniel.pitman@deq.idaho.gov](mailto:daniel.pitman@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, flowing style.

Mike Simon  
Stationary Source Program Manager  
Air Quality Division

MS\DP

Permit No. P-2010.0183 PROJ 61652

Enclosures

## Air Quality

### PERMIT TO CONSTRUCT

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**Permittee** Gem State Processing, LLC

**Permit Number** P-2010.0183

**Project ID** 61652

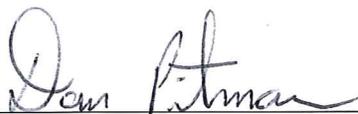
**Facility ID** 067-00038

**Facility Location** 951 Highway 30  
Heyburn, ID 83336

#### 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** August 21, 2017



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Dan Pitman, P.E., Permit Writer



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Mike Simon, Stationary Source Manager

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# 1. PERMIT SCOPE

## Purpose

- 1.1 The purpose of this permit is to allow the production limit on the Wolverine Dehydrators to increase from 21.7 tons per day to 62 tons per day after the Bubble Sheet Dryer No. 1 and Drum Dryer stacks are 100 feet above ground elevation consistent with the modeling demonstration submitted with the application for the permit. [8/21/17]
- 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-2010.0183 project 61406, issued on March 5, 2015. [8/21/17]

## Regulated Sources

- 1.4 The emission sources regulated by this permit are listed in the following table.

**Table 1.1 REGULATED SOURCES**

Permit Section	Source Descriptions	Emission Controls
2	Boiler #1 & #2 Manufacturer: Johnston Boiler Company Model: PFTA 1200-4 Capacity: 49.13 MMBtu/hr, each Fuel: Natural Gas	Low NOx Burner with Flue Gas Recirculation
2	Boiler #3 Manufacturer: Johnston Boiler Company Model: PFTA 1600-4 Capacity: 65.43 MMBtu/hr Fuel: Natural Gas	Low NOx Burner with Flue Gas Recirculation
3	Bubble Sheet Dryer #1 & #2 Manufacturer: Idaho Steel Capacity: 7.0 MMBtu/hr Fuel: Natural Gas	None
4	Drum Dryers (6 Units) Manufacturer: Idaho Steel Capacity: 2250 lb/hr (dry), each Steam Powered	The snifter side of the Drum Dryer includes a cyclone.
5	Dehydrators (2 units, each with multiple stages) Manufacturer: Wolverine Capacity: 10.8 tons per day per each unit Fuel: Natural Gas Btu Rating (MMBtu/hr):  Wolverine #1 & Wolverine #2 Stage A – 18.0 MMBtu/hr each Wolverine #1 & Wolverine #2 Stage B – 6.0 MMBtu/hr each Wolverine #1 & Wolverine #2 Stage C – 2.2 MMBtu/hr each	Low NOx Burners
-	Air Make Up Units (6 units) Manufacturer: REYCO Capacity: Five - 9 MMBtu/hr & One – 10 MMBTU/hr Fuel: Natural Gas	Low NOx burners

Permit Section	Source Descriptions	Emission Controls
6	Potato Handling, Conveying & Storage Silo Bin Vent #1, #2, #3, #4 Rail Loadout Truck Loadout Multipurpose Receiver Off Specification Receiver Super Sack/Tote Receiver (2) Pneumatic Conveying Line Nuisance Dust	12 Baghouses

## 2. BOILERS

### 2.1 Process Description

The primary purpose of the boilers is to provide steam for processes.

### 2.2 Emission Controls Description

Table 2.1 BOILERS DESCRIPTION

Emissions Units / Processes	Emission Control Devices	Emission Points
Boiler #1	Low NOx burner with FGR	Boiler #1 Stack
Boiler #2	Low NOx burner with FGR	Boiler #2 Stack
Boiler #3	Low NOx burner with FGR	Boiler #3 Stack

[2/21/14]

### Operating Requirements

#### 2.3 Stack Height

The height of each boiler exhaust stack shall be at least 60 feet, as measured from the ground level elevation.

#### 2.4 Fuel Type

The boilers shall only combust natural gas.

#### 2.5 Natural Gas Usage

The boilers combined natural gas throughput shall not exceed 1,375 MMscf per any consecutive 12 calendar month period.

### Monitoring and Recordkeeping Requirements

#### 2.6 Natural Gas Usage

The permittee shall monitor and record the total amount of natural gas used in all boilers in million standard cubic feet each month and for each consecutive 12 calendar month period.

[2/21/14]

### NSPS Subpart Dc

#### 2.7 Reporting

In accordance with 40 CFR 60.48c(a), the permittee shall submit notification of the date of construction or reconstruction, and actual startup as required by 40 CFR 60.7 for the boilers. The notification shall include the following:

- 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.

Notification shall be submitted to EPA and DEQ.

U.S. EPA Region 10  
Office of Air Quality  
1200 Sixth Avenue  
Seattle, WA 98101  
Phone: 206.553.1200

Air Quality Permit Compliance  
Twin Falls Regional Office  
Idaho Department of Environmental Quality  
650 Addison Avenue West Suite 110  
Twin Falls, ID 83301  
Phone: 208.736.2190 Fax: 208.736.2194

## **2.8 Recordkeeping**

In accordance with 40 CFR 60.48c(g)(2) and (g)(3) of this section, 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 to meeting the requirements 40 CFR 60.48c(g)(1), the owner or operator may elect to record and maintain records of the amount of each fuel combusted during each calendar month.

As an alternative to meeting the requirements 40 CFR 60.48c(g)(1), the owner or operator 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.

## **2.9 Incorporation by Reference**

Unless expressly provided otherwise, any reference in this permit to any document identified in IDAPA 58.01.01.107.03 shall constitute full incorporation into this permit of that document for the purposes of the reference, including any notes and appendices therein. Documents include, but are not limited to:

- Standard of Performance for New Stationary Sources (NSPS) 40 CFR Part 60. Subpart Dc.

For permit conditions referencing or cited in accordance with any document incorporated by reference, should there be any conflict between the requirements of the permit condition and the requirements of the document, the requirements of the document shall govern, including any amendments to that regulation.

### 3. BUBBLE SHEET DRYERS NO. 1 AND NO. 2

#### 3.1 Process Description

Gem State Processing, LLC uses natural gas fired Bubble Sheet Dryer(s) (aka, the Agglomerator, or Fluidized Bed Dryer) to dry a mixture of dehydrated potato flakes, oils and other flavorings. The mixture passes through the Bubble Sheet Dryer. The dryer is a source of both natural gas combustion emissions and process particulates.

There are two Bubble Sheet Dryers at the facility, Dryer No. 1 and No. 2. The application for the permit only included emissions from Dryer No. 1.

Bubble Sheet Dryer No. 2 is proposed to have no throughput and no emissions. Therefore the throughput to Dryer No. 2 is limited to zero.

[8/21/17]

#### 3.2 Emission Controls Description

Table 3.1 BUBBLE SHEET DRYERS DESCRIPTION

Emissions Units / Processes	Emission Control Devices
Bubble Sheet Dryer #1	None
Bubble Sheet Dryer #2	None

[2/21/14]

#### Emission Limits

##### 3.3 Emission Limits

Particulate matter emissions to the ambient air with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers (PM<sub>10</sub>) or 2.5 micrometers (PM<sub>2.5</sub>) shall not exceed the corresponding emissions rate limits listed in Table 7.1 of this permit.

[2/21/14]

##### 3.4 Opacity Limit

Emissions from any stack, vent, or functionally equivalent 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

##### 3.5 Throughput Limits

3.5.1 The total weight of the product after drying in Bubble Sheet Dryer No. 1, including whatever moisture is present after the dryer, shall not exceed 40 tons per calendar day (total weight of material after the dryer including any moisture present). The production throughput to Bubble Sheet Dryer No. 2 shall be zero.

3.5.2 The total weight of the product after drying in Bubble Sheet Dryer No. 1, including whatever moisture is present after the dryer, shall not exceed 14,058 tons per any consecutive 12 calendar month period.

[8/21/17]

3.6 The height of the exhaust stack for Bubble Sheet Dryer No. 1 shall be at least 100 feet, as measured from the ground level elevation no later than 180 days after permit issuance.

[8/21/17]

## Monitoring and Recordkeeping Requirements

### 3.7 Throughput Monitoring

- 3.7.1 Each calendar day, the permittee shall monitor (either directly or indirectly) and record the total weight of the product that has been processed through Bubble Sheet Dryer No. 1 (total weight of material after the dryer including any moisture present).
- 3.7.2 Each calendar month, the permittee shall monitor (either directly or indirectly) and record the total weight of the product that has been processed through Bubble Sheet Dryer No. 1 during the previous consecutive 12 calendar month period (total weight of material after the dryer including any moisture present).

[8/21/17]

### 3.8 Performance Testing

A performance shall be conducted by December 9, 2021 and once every five calendar years thereafter, to demonstrate compliance with the pound per hour emission limits specified in Table 7.1. The permittee is encouraged to submit a source testing protocol for approval 30 days prior to conducting the performance test.

The permittee shall test in accordance with IDAPA 58.01.01.157, including the General Provisions of this permit. The General Provisions include notification requirements, testing procedures and reporting requirements.

Each 15 minutes during the source test the permittee shall monitor and record the total dry weight of the product that has been processed through Bubble Sheet Dryer No. 1 (total weight of material after the dryer including any moisture present), or use another method to monitor and record the weight of finished product through the dryer during each test run subject to DEQ approval.

The permittee shall include the following information in the source test report:

- Measured stack height above ground level

The source test shall be conducted under “worst case normal” conditions as required by IDAPA 58.01.01.157 and the source test report shall contain documentation that the test was conducted under these conditions and shall address what moisture content the product was dried to, and what oils and other flavorings were added during the test.

[8/21/17]

## 4. DRUM DRYERS

### Process Description

#### 4.1 Process Description

Gem State Processing, LLC operates six steam-heated Drum Dryers to make flakes. The primary purpose of the snifter fan drums is to pull moisture off of the Drum Dryers. Emissions from the snifter fan drums are controlled by cyclones.

[2/21/14]

#### 4.2 Emission Controls Description

Table 4.1 DRUM DRYERS DESCRIPTION

Emissions Units / Processes	Emission Control Devices
Drum Dryers #1 - #6	The snifter side of the Drum Dryer vents through a cyclone.

[2/21/14]

### Emission Limits

#### 4.3 Emission Limits

Particulate matter emissions to the ambient air with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers (PM<sub>10</sub>) or 2.5 micrometers (PM<sub>2.5</sub>) shall not exceed the corresponding emissions rate limits listed in Table 7.1 of this permit.

[2/21/14]

#### 4.4 Opacity Limit

Emissions from any stack, vent, or functionally equivalent 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. The provisions of this section shall not apply when the presence of uncombined water, nitrogen oxides and/or chlorine gas are the only reason(s) for the failure of the emission to comply with the requirements of this rule.

### Operating Requirements

#### 4.5 Throughput Limits

4.5.1 The total weight of the product after drying in the 6 dryers combined, including whatever moisture is present, shall not exceed 162 tons per calendar day.

4.5.2 The total weight of the product after drying in the 6 dryers combined, including whatever moisture is present after the dryer, shall not exceed 57,510 tons per any consecutive 12 calendar month period.

[8/21/17]

#### 4.6 Exhaust Stack Parameters

The Drum Dryer stacks and Drum Dryer snifter stacks shall be combined into one stack per Drum Dryer and the stacks shall be at least 100 feet as measured from the ground level elevation no later than 180 days after permit issuance.

[8/21/17]

## Monitoring and Recordkeeping Requirements

### 4.7 Throughput Monitoring

- 4.7.1 Each calendar day, the permittee shall monitor (either directly or indirectly) and record the total weight of the product that has been processed through all the Drum Dryers combined (total weight of material after all the dryers including any moisture present).
- 4.7.2 Each calendar month, the permittee shall monitor (either directly or indirectly) and record the total weight of the product that has been processed through 6 dryers combined during the previous consecutive 12 calendar month period (total weight of material after the dryer including any moisture present).

[8/21/17]

### 4.8 Performance Testing & Monitoring

The permittee shall conduct an initial performance test on one Drum Dryer's combined stack (drum dryer and snifter combined) no later than 210 days after permit issuance. If a performance test was conducted within 180 days prior to permit issuance on combined stacks, and approved by DEQ, that test may be accepted as the initial source test. A performance test shall be conducted on the selected Drum Dryer Stack to demonstrate compliance with the pound per hour emission limits specified in Table 7.1. The permittee is encouraged to submit a source testing protocol for approval 30 days prior to conducting the performance test.

The permittee shall conduct a performance test once every five calendar years. A different Drum Dryer shall be tested each 5 years.

The permittee shall test in accordance with IDAPA 58.01.01.157, including the General Provisions of this permit. The General Provisions include notification requirements, testing procedures and reporting requirements.

Each 15 minutes during the source test, the permittee shall monitor and record the total dry weight (weight of material after the dryer including whatever moisture is present) of the product that has been processed through the Drum Dryer, or use another method to monitor and record the weight of finished product through the dryer during each test run, subject to DEQ approval.

The permittee shall include the following information in the source test report for each source that is tested:

- Measured stack height above ground level

The source test shall be conducted under "worst case normal" conditions as required by IDAPA 58.01.01.157 and the source test report shall contain documentation that the test was conducted under these conditions and shall address what moisture content the product was dried to, and what oils and other flavorings were added during the test. If water is injected into the cyclone during the test the permittee shall describe how the quantity and frequency of water injection is consistent with "worst case normal conditions".

[8/21/17]

## 5. DEHYDRATORS

### Process Description

- 5.1 Gem State Processing, LLC will install two new dehydrators. The dehydrators are manufactured by Wolverine, Each dryer will have 4 stacks. The dehydrators will be 3 stage dehydrators. Each stage will have its own natural gas fired combustor. Combustor Btu ratings are listed in Table 1. [3/5/15]
- 5.2 Emissions from the dehydrators combustion are controlled by Low NO<sub>x</sub> combustors. [3/5/15]

### Emission Limits

- 5.3 **Emission Limits**  
Particulate matter emissions to the ambient air with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers (PM<sub>10</sub>) or 2.5 micrometers (PM<sub>2.5</sub>) shall not exceed the corresponding emissions rate limits listed in Table 7.1 of this permit. [3/5/15]

### Operating Requirements

- 5.4 **Throughput Limits**
- 5.4.1 The total weight of the product after drying in both Wolverine Dehydrators combined, including whatever moisture is present after the dehydrators, shall not exceed 21.7 tons per calendar day until the exhaust stack for the Bubble Sheet Dryer No. 1 is at least 100 feet as measured from ground elevation, and the Drum Dryer stacks are at least 100 feet as measured from ground elevation.
- 5.4.2 After DEQ has received a certified statement from Gem State Processing, LLC that the exhaust stack for Bubble Sheet Dryer No. 1 and the Drum Dryer stacks are at least 100 feet as measured from ground elevation the total weight of the product after drying in both Wolverine Dehydrators combined, including whatever moisture is present after the dehydrators, shall not exceed 62 tons per calendar day.
- 5.4.3 The total weight of the product after drying in both Wolverine Dehydrators combined, including whatever moisture is present after the dehydrators, shall not exceed 22,010 tons per any consecutive 12 calendar month period. [8/21/17]
- 5.5 **Natural Gas Usage**  
The permittee shall not combust more than 766,704 standard cubic feet per day of natural gas in both the dehydrators combined. [3/5/15]
- 5.6 **Exhaust Stack Parameters**  
The height of all the exhaust stacks for each dehydrator shall be at least 60 feet, as measured from the ground level elevation. [8/21/17]

## Monitoring and Recordkeeping Requirements

### 5.7 Throughput Monitoring

- 5.7.1 Each calendar day the permittee shall monitor and record the combined total weight of the product that has been processed through the dehydrators (total weight of material after the dryers including any moisture present).
- 5.7.2 Each calendar month, the permittee shall monitor (either directly or indirectly) and record the total weight of the product that has been processed through both Wolverine Dehydrators combined during the previous consecutive 12 calendar month period (total weight of material after the dryer including any moisture present).

[8/21/17]

### 5.8 Natural Gas Usage Monitoring

The permittee shall monitor and record the total amount natural gas combusted in the dehydrators in standard cubic feet per calendar day.

[3/5/15]

## Performance Testing

- 5.9 The permittee shall conduct a performance test on all 4 stacks on one dehydrator no later than 60 days after permit issuance to demonstrate compliance with the pound per hour emission limit specified in Table 7.1. If a performance test was conducted within 365 days prior to permit issuance, and approved by DEQ, that test may be accepted as the initial source test. The permittee is encouraged to submit a source testing protocol for approval 30 days prior to conducting the performance test.

The permittee shall conduct a performance test once every five calendar years. A different dehydrator shall be tested each 5 years.

The permittee shall test in accordance with IDAPA 58.01.01.157, including the General Provisions of this permit. The General Provisions include notification requirements, testing procedures and reporting requirements.

Each 15 minutes during the source test, the permittee shall monitor and record the total dry weight (weight of material after the dryer including whatever moisture is present) of the product that has been processed through the dehydrator, or use another method to monitor and record the weight of finished product through the dryer during each test run, subject to DEQ approval.

The permittee shall include the following information in the source test report for each source that is tested:

- Measured stack height above ground level.
- The production rate that was measured each 15 minutes during the test.
- If the dehydrator zones are equipped with temperature settings those settings shall be recorded.
- If the dehydrator is equipped with variable air recirculation rate adjustments those settings shall be recorded.

The source test shall be conducted under “worst case normal” conditions as required by IDAPA 58.01.01.157 and the source test report shall contain documentation that the test was conducted under these conditions and shall address what moisture content the product was dried to, any temperature setting, any air circulation setting, and what oils and other flavorings were added during the test (if any).

[8/21/17]

## 6. RAW POTATO AND POTATO PRODUCT HANDLING

### 6.1 Process Description

Raw potatoes are received and stored in an enclosed building. Potatoes may be steam peeled, dry scrubbed, sorted, sliced, blanched, cooled, steam cooked and dried. Finished potato product is transferred, packaged, stored and shipped offsite.

Baghouses are used to convey the dried flakes to the different packaging areas and include a pneumatic conveying line baghouse (conveys flakes from the Drum Dryers), six plant receiver baghouses, truck loadout baghouse, rail load baghouse, and silo bin vent baghouses (only one of the four silo bin vent baghouses will operate at a time). There are also three negative air baghouses that are associated with the plant receiver baghouses. These baghouses are used as process equipment but also control PM<sub>10</sub> emissions. With the exception of the rail load baghouse and silo bin vent baghouses, all the above listed baghouses discharged into the facility building. A nuisance dust collector baghouse used to control fugitive emissions from process equipment and the above mentioned indoor discharging baghouses will exhaust particulates outside the building.

[3/22/13]

### 6.2 Emission Controls Description

Table 6.1 POTATO HANDLING DESCRIPTION

Emissions Units / Processes	Emission Control Devices
Raw Potato Receiving and storage	Raw Potatoes are received and stored in an enclosed building.
Potato Product Transfer, Handling, Storage	Baghouses

### Operating Requirements

- 6.3 Raw potatoes shall be received and stored in an enclosed building.
- 6.4 Emissions from all potato product transfer, handling and storage shall be controlled by a baghouse. This excludes the arrival and handling of raw potatoes and the shipping of packaged finished product.
- [3/22/13]
- 6.5 The baghouses shall be equipped with bags that are guaranteed by the manufacturer to limit emissions to 0.007 grains per dry standard cubic foot, with the exception that the nuisance dust collector baghouse which shall be equipped with bags that are guaranteed by the manufacturer to limit emissions to 99.9% of PM<sub>10</sub>.
- 6.6 The permittee shall maintain baghouse documentation on-site and it shall be made available in either hard copy or electronic format to DEQ representatives upon request.
- 6.7 The permittee shall maintain a Baghouse/Filter System Procedures document for the inspection and operation of the baghouses/filter system which control emissions from the facility. The Baghouse/Filter System Procedures document shall be a permittee developed document independent of the manufacturer supplied operating manual but may include summaries of procedures included in the manufacturer supplied operating manual.

The Baghouse/Filter System Procedures document shall describe the procedures that will be followed to comply with General Provision 2 and shall contain requirements for weekly see-no-see visible emissions inspections of the baghouse. The inspection shall occur during daylight hours and under normal operating conditions.

The Baghouse/Filter System Procedures document shall also include a schedule and procedures for corrective action that will be taken if visible emissions are present from the baghouse at any time. At a minimum the document shall include:

- procedures to determine if bags or cartridges are ruptured; and
- procedures to determine if bags or cartridges are not appropriately secured in place.

The permittee shall maintain records of the results of each baghouse/filter system inspections in accordance with General Provision 9. The records shall include a description of whether visible emissions were present and if visible emissions were present a description of the corrective action that was taken.

The Baghouse/Filter System Procedures document shall also remain on site at all times and shall be made available to DEQ representatives upon request.

The operating and monitoring requirements specified in the Baghouse/Filter System Procedures document are incorporated by reference to this permit and are enforceable permit conditions.

**[3/22/13]**

- 6.8** The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids into the atmosphere of such nature and duration and under such conditions as would be injurious to human health or welfare, to animal or plant life, or to property, or to interfere unreasonably with the enjoyment of life or property in accordance with IDAPA 58.01.01.776. This condition applies to all sources of emissions at the facility.

**[2/21/14]**

- 6.9** The permittee shall maintain records of all odor complaints received to demonstrate compliance with Permit Condition 5.8 . The permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

**[2/21/14]**

## 7. EMISSION LIMITS

Table 7.1 EMISSIONS LIMITS<sup>1</sup>

Source Description	PM <sub>10</sub> /PM <sub>2.5</sub> <sup>2</sup>	
	lb/hr <sup>3</sup>	T/yr <sup>4</sup>
Bubble Sheet Dryer #1	0.76	3.24
Bubble Sheet Dryer #2	0.00	0.00
Drum Dryer #1 Stack	0.73	3.1
Drum Dryer #2 Stack	0.73	3.1
Drum Dryer #3 Stack	0.73	3.1
Drum Dryer #4 Stack	0.73	3.1
Drum Dryer #5 Stack	0.73	3.1
Drum Dryer #6 Stack	0.73	3.1
Wolverine Dehydrator #1 Stack #1, Stage A	0.20	0.84
Wolverine Dehydrator #1 Stack #2, Stage A	0.35	1.51
Wolverine Dehydrator #1 Stack #3, Stage B	0.25	1.04
Wolverine Dehydrator #1 Stack #4, Stage C	0.12	0.49
Wolverine Dehydrator #2 Stack #1, Stage A	0.20	0.84
Wolverine Dehydrator #2 Stack #2, Stage A	0.35	1.51
Wolverine Dehydrator #2 Stack #3, Stage B	0.25	1.04
Wolverine Dehydrator #2 Stack #4, Stage C	0.12	0.49

- 1) In absence of any other credible evidence, compliance is assured by complying with this permit's operating, monitoring and record keeping requirements.
- 2) Particulate matter with and aerodynamic diameter less than or equal to a nominal ten (10) micrometers or 2.5 micrometers including condensable particulate as defined in IDAPA 58.01.01.006.
- 3) As determined by source test methods prescribed by IDAPA 58.01.01.157, or DEQ approved alternative.
- 4) Tons per consecutive 12-calendar month period.

[8/21/17]

## 8. ROOF TOP EXHAUST VENTS

- 8.1 Permitted exhaust stacks shall vent vertically and shall not be capped.

## 9. GENERAL PROVISIONS

### General Compliance

9.1 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.]

9.2 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]

9.3 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

9.4 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 or 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

9.5 The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211:

- 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.

[IDAPA 58.01.01.211, 5/1/94]

## Performance Testing

- 9.6 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, at its option, may 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.
- 9.7 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.
- 9.8 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]

## Monitoring and Recordkeeping

- 9.9 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]

## Excess Emissions

- 9.10 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

- 9.11 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**

- 9.12 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**

- 9.13 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**

- 9.14 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**

- 9.15 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]