



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

C.L. "Butch" Otter, Governor
Curt Fransen, Director

February 21, 2012

Harry Budke, Engineering Manager
Idapro, LLC - Rupert
1305 Albion Ave.
Burley, ID 83318

RE: Facility ID No. 067-00043, IdaPro, LLC, Rupert
Corrected Permit Transmittal Letter

Dear Mr. Budke:

The Department of Environmental Quality (DEQ) is reissuing Permit to Construct (PTC) No. P-2012.0063 to IdaPro, LLC. This is being done to correct the reference from "wet" potato waste to "dried" potato waste from the drum dryer in Permit Conditions 2.7 and 2.10 of the previously issued permit.

Enclosed is the corrected version of Permit to Construct P-2012.0063, Project 61120, issued January 31, 2013. Please replace the existing copy of your permit with the enclosed, corrected permit. The accompanying Statement of Basis document remains unchanged.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Simon".

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS/dp

Enclosure

Permit No. P-2012.0063 Project 61120

AIR QUALITY

PERMIT TO CONSTRUCT

Permittee	IdaPro, LLC - Rupert
Permit Number	P-2012.0063
Project ID	61120
Facility ID	067-00043
Facility Location	501 S. Oneida Rupert, ID 83350

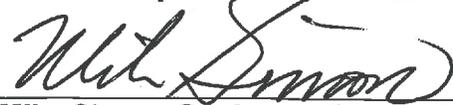
Permit Authority

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 January 31, 2013



Darrin Pampaian, P.E., Permit Writer



Mike Simon, Stationary Source Manager

Contents

1	Permit Scope.....	3
2	Drum Dryer.....	4
3	Air Makeup Unit.....	7
4	General Provisions.....	8

1 Permit Scope

Purpose

1.1 This is the initial permit to construct (PTC) for a potato processing operation.

Regulated Sources

Table 1.1 lists all sources of regulated emissions in this permit.

Table 1.1 Regulated Sources

Permit Section	Source	Control Equipment
2	Drum dryer	N/A
3	Air makeup unit	

2 Drum Dryer

2.1 Process Description

IdaPro, LLC (IdaPro) is a potato processing company that processes peels and other potato waste products via dehydration. The proposed new Rupert facility will produce dehydrated potato flakes and other dehydrated potato products. The potato products are dried to 8% moisture and are broken up, packaged or stored, and then sold. Wet solids enter at the largest diameter of the drum dryer, away from hot combustion gases. Hot air enters the feed zone at the centerline of the drum dryer while the wet solids enter away from the center, landing directly on the flighting. As the drum dryer rotates, the flights lift the wet feed upward. With further rotation, the particles are gradually released to fall downward through the hot gases in a thin curtain.

Raw peels and potato waste products are trucked to the facility. The potato material is then shredded and routed to the drum dryer. The dried potato products from the drum dryer are sent through a cyclone prior to being exhausted out the stack. The cyclone (considered process equipment) is used to minimize the moisture from the dried potato products, recover the dried potato products, and to recover starch from the waste water. The exhaust from the cyclone is then sent to a stack which will be located at the northern end of the facility. The finished product is then stored or trucked offsite.

2.2 Control Device Descriptions

Table 2.1 Drum Dryer Description

Emissions Units / Processes	Control Devices	Emission Points
Drum dryer: Manufacturer: Dupps Model: QuadPass Four Zone Rotary Drum Dryer Burner Manufacturer: Maxon Burner Model: Kindizer LE 14" low NO _x Manufacture Date: 2012 Heat input rating: 55.0 MMBtu/hr Max. potato production: 12,174 lb/hr Fuel: Natural gas only	N/A	Exhaust stack

Emission Limits

2.3 Emission Limits

The emissions from the drum dryer stack shall not exceed any corresponding emissions rate limits listed in Table 2.2.

Table 2.2 Drum Dryer Emission Limits

Source Description	PM ₁₀ /PM _{2.5} ^(b)		NO _x	
	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(c)
Drum dryer ^(e)	4.30	18.82	2.70	11.81

- a In absence of any other credible evidence, compliance is ensured by complying with permit operating, monitoring, and record keeping requirements.
- b Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.
- c Pounds per hour, as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference test method, continuous emission monitoring system (CEMS) data, or DEQ-approved alternative.
- d Tons per any consecutive 12-calendar month period.
- e PM₁₀/PM_{2.5} emissions from the air makeup unit are included with the drum dryer for performance testing purposes.

2.4 Opacity Limit

Emissions from the drum dryer stack, or any other stack, vent, or functionally equivalent opening associated with the drum dryer, 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.

2.5 Odors

The permittee shall not allow, suffer, cause, or permit the emission of odorous gasses, liquids, or solids to the atmosphere in such quantities as to cause air pollution in accordance with IDAPA 58.01.01.776.01.

Operating Requirements

2.6 Fuel Requirement

Only natural gas shall be combusted in the drum dryer.

2.7 Throughput Limit

The output of dried potato waste from the drum dryer shall not exceed 292,176 pounds per day.

2.8 Burner Requirement

The drum dryer shall be equipped with a Maxon model Kindizer LE 14" low NO_x burner.

2.9 Odor Management Plan

The permittee shall develop, within 90 days of permit issuance, and maintain an Odor Management Plan that describes the methods and procedures that will be used and followed when odor complaints are received by the Permittee or DEQ staff.

The odor management plan shall include detailed information including, but not limited to the following.

- Procedures that will be used by the Permittee to address odor complaints received by the Permittee or DEQ staff.
- Procedures that will be used by the Permittee to identify the source of odors at the facility.
- Methods that will be used by the Permittee to control sources of odors at the facility after they have been identified.
- If odor control technology is used, the permittee shall maintain a copy of the operating requirements and manufacturer recommendations for the odor control technology, and shall incorporate these operating requirements and recommendations into the Odor Management Plan.

The Odor Management Plan, including all subsequent additions and revisions, shall remain on site at all times and shall be made available to DEQ representatives upon request.

Once developed, a copy of the Odor Management Plan shall be submitted for review and comment to the DEQ Twin Falls Regional Office:

Air Quality Permit Compliance
Department of Environmental Quality
Twin Falls Regional Office
1363 Fillmore
Twin Falls, ID 83301

Monitoring and Recordkeeping Requirements

2.10 Throughput Monitoring

The permittee shall monitor and record the dried potato waste output from the drum dryer, in pounds per day, to demonstrate compliance with the Throughput Limit permit condition.

2.11 Odor Complaints

The permittee shall maintain records of all odor complaints received by the facility from members of the public. 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.

Performance Testing Requirements

2.12 Initial PM₁₀/PM_{2.5} Performance Test

Performance testing on the drum dryer stack shall be performed within 180 days of initial startup.

The performance test shall measure the PM₁₀/PM_{2.5} emission rate in pounds per hour to demonstrate compliance with the Emissions Limits permit condition.

The performance test shall be conducted under worst-case normal operating conditions and in accordance with IDAPA 58.01.01.157, and the Performance Testing General Provision of this permit. The permittee is encouraged to submit a performance testing protocol for approval 30 days prior to conducting the performance tests.

2.13 PM₁₀/PM_{2.5} Performance Testing Methods and Procedures

The permittee shall use EPA Methods 5 and 202, or EPA Methods 201A and 202, or such comparable and equivalent methods approved in accordance with Subsection 157.02.d, to determine compliance with the Emissions Limits permit condition.

2.14 Performance Test Monitoring and Recordkeeping

The permittee shall monitor and record the potato waste processed during the initial PM₁₀/PM_{2.5} performance test.

Reporting Requirements

2.15 Performance Test Reporting

Performance test reports shall include records of the monitoring and recordkeeping required by the Performance Test Monitoring and Recordkeeping permit condition. Performance test reports shall be submitted by the permittee to the following address:

Air Quality Permit Compliance
Department of Environmental Quality
Twin Falls Regional Office
1363 Fillmore
Twin Falls, ID 83301
Phone: (208) 736-2190
Fax: (208) 736-2194

3 Air Makeup Unit

3.1 Process Description

A natural-gas fired air makeup unit (AMU) is used onsite for comfort air circulation and heating within the facility. Natural gas combustion emissions from the AMU are routed through the same exhaust stack as the drum dryer.

3.2 Control Device Descriptions

Table 3.1 Air Makeup Unit Description

Emissions Units / Processes	Control Devices	Emission Points
<u>Air makeup unit:</u> Manufacturer: The King Co. Model: 2180-7F-F-HRS Manufacture Date: 1995 Heat input rating: 7.975 MMBtu/hr Fuel: Natural gas only	N/A	Exhaust stack

Emission Limits

3.3 Emission Limits

The emissions from the air makeup unit stack shall not exceed any corresponding emissions rate limits listed in Table 3.2.

Table 3.2 Air Makeup Unit Emission Limits

Source Description	PM ₁₀ /PM _{2.5} ^(b)		NO _x	
	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)
Air makeup unit	-(e)	-(e)	0.78	3.44

- a In absence of any other credible evidence, compliance is ensured by complying with permit operating, monitoring, and record keeping requirements.
- b Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.
- c Pounds per hour, as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference test method, continuous emission monitoring system (CEMS) data, or DEQ-approved alternative.
- d Tons per any consecutive 12-calendar month period.
- e PM₁₀/PM_{2.5} emissions from the air makeup unit are included with the drum dryer for performance testing purposes.

3.4 Opacity Limit

Emissions from the air makeup unit stack, or any other stack, vent, or functionally equivalent opening associated with the air makeup unit, 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 Fuel Requirement

Only natural gas shall be combusted in the air makeup unit.

4 General Provisions

General Compliance

- 4.1 The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the "Rules for the Control of Air Pollution in Idaho." The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit, the "Rules for the Control of Air Pollution in Idaho," and the Environmental Protection and Health Act (Idaho Code §39-101, et seq.)
[Idaho Code §39-101, et seq.]
- 4.2 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]
- 4.3 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

- 4.4 Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:
- Enter upon the permittee's premises where an emissions source is located, emissions-related activity is conducted, or where records are kept under conditions of this permit;
 - Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
 - Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.
- [Idaho Code §39-108]

Construction and Operation Notification

- 4.5 This permit shall expire if construction has not begun within two years of its issue date, or if construction is suspended for one year.
[IDAPA 58.01.01.211.02, 5/1/94]
- 4.6 The permittee shall furnish DEQ written notifications as follows:
- A notification of the date of initiation of construction, within five working days after occurrence; except in the case where pre-permit construction approval has been granted then notification shall be made within five working days after occurrence or within five working days after permit issuance whichever is later;

- A notification of the date of any suspension of construction, if such suspension lasts for one year or more;
- A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date; and
- A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
- A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211.03, 5/1/94]

Performance Testing

- 4.7 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.
- 4.8 All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.
- 4.9 Within 60 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/00]

Monitoring and Recordkeeping

- 4.10 The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Monitoring records shall include, but not be limited to, the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.211, 5/1/94]

Excess Emissions

- 4.11 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130–136 for excess emissions due to start-up, shut-down, scheduled maintenance, safety measures, upsets, and breakdowns.

[IDAPA 58.01.01.130–136, 4/5/00]

Certification

- 4.12 All documents submitted to DEQ—including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification—shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

[IDAPA 58.01.01.123, 5/1/94]

False Statements

- 4.13 No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

Tampering

- 4.14 No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

Transferability

- 4.15 This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

[IDAPA 58.01.01.209.06, 4/11/06]

Severability

- 4.16 The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

[IDAPA 58.01.01.211, 5/1/94]