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 4, 2013

Gene Gallegos, Unit Director Nampa FG
J.R. Simplot Company, Nampa Food Potato Processing Plant
3704 North Middleton Road
Nampa, Idaho 83687

RE: Facility ID No. 027-00059, Nampa Food Potato Processing Plant, Nampa
Final Permit Letter

Dear Mr. Gallegos:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2012.0036 Project 61073 to Nampa Food Potato Processing Plant located at Nampa for converting the T2-2007.0168 Tier II/ PTC permit to a PTC permit and limiting the facility's Greenhouse Gas emissions. 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 June 5, 2012.

This permit is effective immediately and replaces Tier II/PTC T-2 2007.0168 issued on November 20, 2007. This permit does not release Nampa Food Potato Processing Plant from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Tom Krinke, Air Quality Compliance Officer, at (208) 373-0550 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 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,

Mike Simon
Stationary Source Program Manager
Air Quality Division

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Permit No. P-2012.0036 PROJ 61073

Enclosures

Air Quality

PERMIT TO CONSTRUCT

Permittee	J.R. Simplot Company-Food Group - Nampa
Permit Number	P-2012.0036
Project ID	61073
Facility ID	027-00059
Facility Location	3704 North Middleton Road Nampa, Idaho 83687

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 February 4, 2013

Date Revised

Robert Baldwin, Permit Writer

Mike Simon, Stationary Source Manager

Contents

1 Permit Scope

Purpose

1.1 This is a revised permit to construct (PTC) for the replacement of the existing PTC/T2 permit No. 2007.0168 issued on November 20, 2007 and to establish a greenhouse gas (GHG) emissions limit.

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/Tier II permit No. T2-2007.0168, issued on November 20, 2007.

Regulated Sources

Table 1.1 All sources of regulated emissions in this permit.

Permit Section	Source	Control Equipment
3	Natural Gas Combustion Equipment Name: Nebraska Boiler Manufacturer: Nebraska Model: MS-E-66 Fuel: Natural Gas Maximum Rated Capacity: 99.8 MMBtu/hr; 75,000 lbs of steam/hr	None
	Name: Cleaver Brooks Boiler Manufacturer: Cleaver Brooks Model: DL 68 WL 1097 Fuel: Natural Gas Maximum Rated Capacity: 70 MMBtu/hr, 50,000 lbs of steam/hr	None
	Name: Air Makeup Units (AMUs) (9 total) Manufacturers: Aerovent Gas (2), Aerovent (1), Aladdin (1), Reyco Systems (1), King (3), Unknown (1) Models: G3-32B4 Type DW, G60 V 604 (Aerovent Gas AMUs), BA 490 DWD1 (Aladdin), others unknown Fuel: Natural Gas Maximum Rated Capacity: All less than 10 MMBtu/hr	None
4	Process Equipment Name: Main Line Dryer Manufacturer: National Drying Model: 1987 CARN Fuel: Natural Gas Maximum Production Rate: 38,000 lb/hr; 21 MMBtu/hr	None
	Name: Main Line Fryer Manufacturer: Heat and Control Model: FF6028-5-3F Fuel: Steam Maximum Production Rate: 38,000 lbs/hr	Name: Wet Electrostatic Precipitator Manufacturer: Geoenergy Model: E-tube Date installed: 2007 Pre-Control device: Cyclone
	Name: Specialty Line Dryer/Cooler Manufacturer: Proctor Schwartz Model: K21761 Fuel: None Maximum Production Rate: 3,500 lbs/hr	None
	Name: Specialty Line Dryer Manufacturer: Proctor Schwartz Model: K21761 Fuel: Natural Gas Maximum Production Rate: 3,500 lbs/hr; 2 MMBtu/hr	None
	Name: Specialty Line Fryer Manufacturer: Gem Equipment Model: 1700 Fuel: Steam Maximum Production Rate: 3,500 lbs/hr	Name: Wet Electrostatic Precipitator Manufacturer: Geoenergy Model: E-tube Date installed: 2007 Pre-Control device: Cyclone

2 Facility-wide Conditions

Fugitive Emissions

2.1 All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651. In determining what is reasonable considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of particulate matter. Some of the reasonable precautions include, but are not limited to, the following:

- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands.
- Application, where practical, of asphalt, oil, water, or suitable chemicals to, or covering of, dirt roads, material stockpiles, and other surfaces which can create dust.
- Installation and use, where practical, of hoods, fans, and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
- Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts.
- Paving of roadways and their maintenance in a clean condition, where practical.
- Prompt removal of earth or other stored material from streets, where practical.

2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.

2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date that 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.

2.4 The permittee shall conduct a quarterly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (If observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

Odors

2.5 The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

2.6 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records

shall include, at a minimum, the date that 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.

Visible Emissions

2.7 The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, NO_x, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.

2.8 The permittee shall conduct a quarterly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see evaluation for each potential source. 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 conducting the opacity test. 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 visible emissions inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test 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.

Open Burning

2.9 The permittee shall comply with the requirements of the Rules for Control of Open Burning, IDAPA 58.01.01.600-617.

Reports and Certifications

2.10 Any reporting required by this permit, including but not limited to, records, monitoring data, supporting information, requests for confidential treatment, notifications of intent to test, testing reports, or compliance certifications 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. Any reporting required by this permit, shall be submitted to the following address:

Air Quality Permit Compliance
Department of Environmental Quality
Boise Regional Office
1445 N. Orchard
Boise, Idaho 83706-2239
Phone: (208) 373-0550
Fax: (208) 373-0287

Fuel-burning Equipment

2.11 The permittee shall not discharge to the atmosphere from any fuel-burning equipment PM in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas, 0.050 gr/dscf of effluent gas corrected to 3% oxygen by volume for liquid, 0.050 gr/dscf of effluent gas corrected to 8% oxygen by volume for coal, and 0.080 gr/dscf of effluent gas corrected to 8% oxygen by volume for wood products.

Sulfur Content

2.12 No person shall sell, distribute, use, or make available for use any distillate fuel oil containing more than the following percentages of sulfur:

- ASTM Grade 1 fuel oil - 0.3% by weight.
- ASTM Grade 2 fuel oil - 0.5% by weight.
- ASTM Grades 4, 5, and 6 fuel oil - 1.75% by weight.

2.13 The permittee shall not sell, distribute, use, or make available for use any coal containing greater than 1% sulfur by weight.

2.14 The permittee shall maintain documentation of supplier verification of distillate fuel oil content on an as-received basis.

3 Natural Gas Combustion Equipment

3.1 Process Description

The primary purpose of the Nebraska and Cleaver Brooks boilers is generating process steam. The nine air makeup units provide space heat for the facility.

3.2 Control Device Descriptions

Emissions from the natural gas combustion sources are uncontrolled.

Emission Limits

3.3 Particulate Matter Emission Limits

The permittee shall not discharge to the atmosphere from any fuel-burning equipment particulate matter in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas in accordance with IDAPA 58.01.01.677.

3.4 GHG Emission Limit

The permittee shall not discharge to the atmosphere from the entire facility GHG emissions that exceed 99, 000 tons per consecutive 12-month period.

[2/4/2013]

Operating Requirements

3.5 Throughput Limits

Permittee shall not exceed the combustion of 1,692,000 MM BTU of natural gas for any consecutive 12-month period.

[2/4/2013]

3.6 Fuel Use

The permittee shall combust natural gas exclusively in the Nebraska and Cleaver Brooks boilers, and the air makeup units.

Monitoring and Recordkeeping Requirements

3.7 Throughput Monitoring

The permittee shall monitor and record the total amount of natural gas combusted at the facility on a consecutive 12-month period basis.

[2/4/2013]

3.8 NSPS Fuel Consumption

The permittee shall monitor and record the amount of natural gas combusted in the Nebraska boiler on a daily or monthly basis in accordance with 40 CFR 60, Subpart Dc.

4 Process Equipment

4.1 Process Description

The process equipment at the facility includes the Main Line and Specialty Line. The drying and frying of potatoes are the activities that emit pollutants.

4.2 Control Device Descriptions

A wet electrostatic precipitator (WESP) controls visible emissions form the Main Line Fryer and the Specialty Line Fryer exhaust stacks.

Operating Requirements

4.3 Emissions Control Device Use

The permittee shall operate the WESP whenever any fryer operated has visible emissions that may exceed the requirements in the permit.

4.4 Monitoring Equipment

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

4.5 Operations and Maintenance (O&M) Manual Requirements

Within 60 days of permit issuance, the permittee shall have developed an O&M manual for the WESP that describes the procedures that will be followed to comply with the General Provisions 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 be submitted to DEQ once developed and shall remain on site at all times and be made available to DEQ representatives upon request.

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

Monitoring and Recordkeeping Requirements

4.6 Monitoring Requirement

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.

5 Emergency Engines

5.1 **Process Description**

There are two spark ignition (SI) emergency engines at the facility. Both engines capacities are below 100 horsepower.

5.2 **Control Device Descriptions**

The emergency engines do not have any emission control devices.

Operating Requirements

5.3 In accordance with 40 CFR 63.6595(a), If you have an existing stationary SI RICE located at an area source of HAP emissions, you must comply with the applicable emission limitations and operating limitations no later than October 19, 2013.

[2/4/2013]

5.4 In accordance with 40 CFR 63.6595(c), if you own or operate an affected source, you must meet the applicable notification requirements in 40 CFR part 63, subpart A, that apply.

[2/4/2013]

5.5 In accordance with 40 CFR 6603(a) if you own or operate an existing stationary RICE located at an area source of HAP emissions, you must comply with the requirements in Table 2d that apply to you.

- Change oil and filter every 500 hours of operation or annually, whichever comes first;
- Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first;
- And inspect all hoses and belts every 500 hours of operations or annually whichever comes first, and replace as necessary.

[2/4/2013]

5.6 In accordance with 40 CFR 63.6625,

(e) If you own or operate an existing emergency located at an area source of HAPs emissions, you must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission –related instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions

(f) If you own or operate an existing emergency stationary RICE located at an area source of HAPs emissions you must install a non-resettable hour work meter if one is not already installed.

(h) If you operate an existing stationary engine, you must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all time other than startup in table 2d to this subpart apply.

(i) If you own or operate a stationary SI engine that is subject to the work, operation or management practices in item 5 of Table 2d to this subpart you have the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Table 2d to this subpart.

[2/4/2013]

5.7 In accordance with 40 CFR 63.6605,
(a) You must be in compliance with the emission limitations and operating limitations in this subpart that apply to you at all times.

[2/4/2013]

5.8 In accordance with 40 CFR 63.6640,
(a) You must demonstrate continuous compliance with each emission limitation or operating limitation in Table 2d to this subpart that apply to you according to the methods specified in Table 6 to this subpart.

[2/4/2013]

Monitoring and Recordkeeping Requirements

5.9 In accordance with 40 CFR 63.6655(e) you must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after treatment control device (if any) according to your own maintenance plan if you own or operate any of the following stationary RICE:

(2) An existing stationary RICE located at an area source of HAP emissions subject to management practices as shown in Table 2d of this subpart.

[2/4/2013]

5.10 In accordance with 40 CFR 63.6660, you must keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record according to 40 CFR 63.10(b)(1).

40 CFR 63.10(b) General recordkeeping requirements. (1) The owner or operator of an affected source subject to the provisions of this part shall maintain files of all information (including all reports and notifications) required by this part recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained on site. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.

[2/4/2013]

Reporting Requirements

5.11 In accordance with Table 2d to Subpart ZZZZ of 40 CFR 63 Footnote 2, any change from the stated management practice during emergency operations must be reported.

[2/4/2013]

6 General Provisions

General Compliance

6.1 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.]

6.2 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]

6.3 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

6.4 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

6.5 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]

6.6 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;

Excess Emissions

6.11 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

6.12 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

6.13 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

6.14 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

6.15 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

6.16 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]