



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

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

Dirk Kempthorne, Governor  
C. Stephen Allred, Director

February 11, 2003

**Certified Mail No. 7000 1530 0005 5348 6971**

Chad Eberhard, Plant Manager  
Basic American Foods, Inc.  
434 S. Emerson Ave.  
Shelley, ID 83274

RE: AIRS Facility No. 011-00020, Basic American Foods Inc., Shelley  
Permit to Construct Revision, Change in Ownership

Dear Mr. Eberhard:

The Department of Environmental Quality (Department) is issuing modified Permit to Construct No. 011-00020 for Basic American Foods' Shelley facility in accordance with IDAPA 58.01.01.200 - 228. The enclosed permit is effective immediately and is based on your permit application, received October 23, 2001.

This permit does not release Basic American Foods Inc. from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Richard Elkins of the Pocatello Regional Office will contact you regarding a meeting with the Department to discuss the permit terms and requirements. The Department recommends the following representatives attend this meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, the Department encourages you to contact Mike Simon at 373-0212 to discuss any questions or concerns you may have with the enclosed permit.

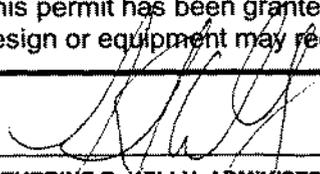
Sincerely,

  
Katherine B. Kelly  
Administrator  
Air Quality Division

KK/bh P-010302 B

Enclosures

P-010302B

 <p style="text-align: center;"><b>Air Quality</b> <b>PERMIT TO CONSTRUCT</b> State of Idaho Department of Environmental Quality</p>	<b>PERMIT NO.</b> 011-00020	
	<b>AQCR:</b> 061	<b>CLASS:</b> A
	<b>SIC:</b> 2034	<b>ZONE:</b> 12
	<b>UTM COORDINATE (km):</b> 409.0, 4803.5	
<b>1. PERMITTEE</b> Basic American Foods, Inc.		
<b>2. PROJECT</b> Ownership Transfer (Boilers No. 4 and Process B)		
<b>3. MAILING ADDRESS</b> 434 S. Emerson Ave.	<b>CITY</b> Shelley	<b>STATE</b> ID
		<b>ZIP</b> 83274
<b>4. FACILITY CONTACT</b> Larry Sautter	<b>TITLE</b> Environmental Manager	<b>TELEPHONE</b> (208) 357-3402
<b>5. RESPONSIBLE OFFICIAL</b> Chad Eberhard	<b>TITLE</b> Plant Manager	<b>TELEPHONE</b> (208) 357-3402
<b>6. EXACT PLANT LOCATION</b> 434 S. Emerson Ave., Shelley, ID 83274		<b>COUNTY</b> Bingham
<b>7. GENERAL NATURE OF BUSINESS &amp; KINDS OF PRODUCTS</b> Potato Processing and Packaging		
<b>8. GENERAL CONDITIONS</b> <p>This permit is issued according to IDAPA 58.01.01.200, <i>Rules for the Control of Air Pollution in Idaho</i>, and pertains only to emissions of air contaminants are regulated by the state of Idaho and to the sources specifically allowed to be constructed by this permit.</p> <p>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; and (d) in no manner implies or suggests that the Department of Environmental Quality or its officers, agents, or employees, assumes 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.</p> <p>This permit is not transferable to another person, place, or piece or set of equipment and will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.</p> <p>This permit has been granted on the basis of design information presented with its application. Changes of design or equipment may require Department approval pursuant to IDAPA 58.01.01.200, et seq.</p>		
 <hr/> <b>KATHERINE B. KELLY, ADMINISTRATOR, AIR QUALITY DIVISION</b> DEPARTMENT OF ENVIRONMENTAL QUALITY		<b>DATE ISSUED:</b> <u>February 11, 2003</u>

## ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

AQCR	Air Quality Control Region
CO	carbon monoxide
Department	Department of Environmental Quality
gr	grain (1 lb = 7,000 grains)
gr/dscf	grains per dry standard cubic feet
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pounds per hour
MMBtu/hr	million British thermal units per hour
MMdscf/day	million dry standard cubic feet per day
NO <sub>x</sub>	nitrogen oxides
PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
SIC	Standard Industrial Classification
SO <sub>2</sub>	sulfur dioxide
T/hr	tons per hour
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

**AIR QUALITY PERMIT TO CONSTRUCT No. 011-00020**

**Permittee:** Basic American Foods, Inc.  
**Location:** Shelley, Idaho

**Date Issued:** February 11, 2003

**1. PERMIT TO CONSTRUCT SCOPE**

***Purpose***

This PTC incorporates the following permits:

- PTC No. 0140-0020, issued November 20, 1986
- PTC No. 0140-0040, issued March 20, 1990

***Regulated Sources***

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

**Table 1.1 REGULATED EMISSIONS SOURCES**

<b>Permit Condition(s)</b>	<b>Source Description</b>	<b>Emissions Control(s)</b>
2.3, 2.4	Boiler No. 4	None
2.3, 2.4	Process B	None

**AIR QUALITY PERMIT TO CONSTRUCT No. 011-00020**

**Permittee:** Basic American Foods, Inc.  
**Location:** Shelley, Idaho

**Date Issued:** February 11, 2003

**2. EMISSIONS UNIT: BOILER NO. 4 AND PROCESS B**

**2.1 Process Description**

The following is a narrative description of Boiler No. 4 and Process B. This description is for informational purposes only.

The facility operates Boiler No. 4 to provide steam to the processes throughout the plant. Boiler No. 4 is a Cleaver Brooks Model DI-76-RH with a rated heat input of 72.1 MMBtu/hr, installed in 1989.

Process B produces dehydrated potato products. The raw materials input to the process are cooked potatoes, wet potato pieces, and food additives including sulfites. Drying heat is provided by indirect contact with steam and natural gas combustion. This process was installed in 1986.

**2.2 Emissions Control Description**

Table 2.1 lists all sources of regulated emissions in this permit to construct.

**Table 2.1 BOILER NO. 4 AND PROCESS B**

<b>Emission Unit(s) / Process(es)</b>	<b>Emissions Control Device</b>	<b>Emissions Point</b>
Boiler No. 4	None	Boiler No. 4 Stack
Process B	None	P6-1, P8-1N, P8-1S, P8-2N, P8-2S P9-1, P10-1, P11-1

***Emission Limits***

**2.3 Emission Limits**

- The SO<sub>2</sub>, NO<sub>x</sub>, CO, VOC, and PM<sub>10</sub> emissions shall not exceed any corresponding emission limit listed in the permit appendix.
- The PM<sub>10</sub> emissions emanating from each stack of Boiler No. 4 shall not exceed 0.015 gr/dscf corrected to 3% oxygen in the stack gas, in accordance with IDAPA 58.01.01.676.
- The PM<sub>10</sub> emissions emanating from each stack of Process B shall not exceed 0.2 gr/dscf in the stack gas, in accordance with IDAPA 58.01.01.710.08(b).

**2.4 Opacity Limit**

Emissions from the stacks, vents, or other functionally equivalent openings of Boiler No. 4 and Process B 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.

**AIR QUALITY PERMIT TO CONSTRUCT No. 011-00020**

**Permittee:** Basic American Foods, Inc.  
**Location:** Shelley, Idaho

**Date Issued:** February 11, 2003

***Operating Requirements***

**2.5 Natural Gas Combustion**

The permittee shall combust natural gas exclusively in Boiler No. 4.

**2.6 Process B Infeed Rate**

The average raw-potato infeed rate for Process B shall not exceed 19.9 T/hr. The infeed rate shall be calculated by multiplying the daily average, finished dry-production rate (pounds per hour) by the raw-to-dry factor of 6.02, then dividing by 2,000 pounds per ton, to convert to tons per hour.

**2.7 Boiler No. 4 Fuel Usage Rate**

The total fuel usage in Boiler No. 4 shall not exceed 1.70 MMdscf/day of natural gas.

***Monitoring and Recordkeeping Requirements***

**2.8 Monitor Operating Parameters**

A compilation of the most recent two years of records shall be kept on site and shall be made available to Department representatives upon request. The permittee shall monitor and record the following information:

- **Infeed Rate Monitoring**

The permittee shall monitor and record the hourly average, raw-potato infeed rate to Process B each day during the calendar year.

- **Fuel Usage Monitoring**

The permittee shall install, calibrate, and maintain a flow meter to continuously monitor the fuel usage in Boiler No. 4. The total fuel use shall be recorded daily.

**2.9 Boiler Tuning**

The permittee shall demonstrate compliance with the emission limits set forth in Permit Condition 1.1 through annual tuning of Boiler No. 4 by trained personnel.

**AIR QUALITY PERMIT TO CONSTRUCT No. 011-00020**

**Permittee:** Basic American Foods, Inc.

**Date Issued:** February 11, 2003

**Location:** Shelley, Idaho

**3. APPENDIX**

**EMISSION LIMITS - HOURLY AND ANNUAL<sup>2</sup>**

Source Description	SO <sub>2</sub>		NO <sub>x</sub>		CO		PM <sub>10</sub>		VOC	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Boiler No. 4 <sup>1</sup>	0.13	0.74	10.16	44.40	11.26	49.20	0.55	2.40	1.28	5.6
Process B							4.95	21.68		
<b>Total Emissions</b>	<b>0.13</b>	<b>0.74</b>	<b>10.16</b>	<b>44.40</b>	<b>11.26</b>	<b>49.20</b>	<b>5.49</b>	<b>24.08</b>	<b>1.28</b>	<b>5.6</b>

<sup>1</sup> as determined by emission estimation methods based on published boiler manufacturer's emission data.

<sup>2</sup> as determined by multiplying the actual or allowable (if actual is not available) pound-per-hour-emission rate by the allowable hours per year that the process(es) may operate, or by actual annual production rates.

**AIR QUALITY PERMIT TO CONSTRUCT No. 011-00020**

**Permittee:** Basic American Foods, Inc.  
**Location:** Shelley, Idaho

**Date Issued:** February 11, 2003

**4. PERMIT TO CONSTRUCT GENERAL PROVISIONS**

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the *Rules for the Control of Air Pollution in Idaho*. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the *Rules for the Control of Air Pollution in Idaho*, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq., and the permittee is subject to penalties for each day of noncompliance.
2. The permittee shall at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.
3. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
  - To enter, at reasonable times, upon the premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
  - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack compliance testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.
4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
5. The permittee shall notify the Department, in writing, of the required information for the following events within five working days after occurrence:
  - Initiation of Construction - Date
  - Completion/Cessation of Construction - Date
  - Actual Production Startup - Date
  - Initial Date of Achieving Maximum Production Rate - Production Rate and Date
6. If compliance testing is specified, the permittee must schedule and perform such testing within 60 days after achieving the maximum production rate, and not later than 180 days after initial startup. This requirement shall be construed as an ongoing requirement. The permittee shall not operate the source without testing within 180 days. If testing is not conducted within 180 days after initial startup, then each day of operation thereafter without the required compliance test constitutes a violation. Such testing must **strictly** adhere to the procedures outlined in IDAPA 58.01.01.157 and shall not be conducted on weekends or state holidays without prior written approval from the Department. Testing procedures and specific time limitations may be modified by the Department by prior negotiation if conditions warrant adjustment. The Department shall be notified at least 15 days prior to the scheduled compliance test. Any records or data generated as a result of such compliance test shall be made available to the Department upon request.
7. 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.

**AIR QUALITY PERMIT TO CONSTRUCT No. 011-00020**

**Permittee:** Basic American Foods, Inc.

**Date Issued:** February 11, 2003

**Location:** Shelley, Idaho

- 8 In accordance with IDAPA 58.01.01.123, all documents submitted to the department, 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.