



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

Dirk Kempthorne, Governor
Toni Hardesty, Director

April 21, 2006

Certified Mail No. 7005 1160 0000 1550 3413

Bruce Hauber
Unit Director
J. R. Simplot Company, Food Group
P. O. Box 460
Aberdeen, ID 83210

RE: Facility ID No. 011-00029, J. R. Simplot Company, Food Group, Aberdeen
Final Permit Letter

Dear Mr. Hauber:

The Idaho Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-050313 to J. R. Simplot Company, Food Group, in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho).

This permit is based on your permit application received on May 9, 2005. This permit is effective immediately and replaces PTC No. 011-00029, issued on June 8, 1999, the terms and conditions of which no longer apply. This permit does not release J. R. Simplot Company from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

A PTC processing fee of \$5,000 was paid to DEQ by J. R. Simplot Company on September 23, 2005, based on an initial fee assessment in the draft PTC analysis. Additional emission estimate information was received by DEQ after the draft permit was issued, and a revised emission inventory resulted in a lower permit processing fee assessment of \$2,500. Therefore, the DEQ Fiscal Office will issue J. R. Simplot Company a refund of \$2,500.

A representative of the Pocatello Regional Office will contact you regarding a meeting with DEQ to discuss the permit terms and requirements. DEQ recommends the following representatives attend the 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, I encourage you to call Dan Pitman at (208) 373-0500 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Martin Bauer, Administrator
Air Quality Division

MB/CZ/bf

Permit No. P-050313

Enclosures



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

PERMIT No.: P-050313
FACILITY ID No.: 011-00029
AQCR: 061 **CLASS: B**
SIC: 2037 **ZONE: 12**
UTM COORDINATE (km): 350.5, 4756.4

1. PERMITTEE
J. R. Simplot Company, Food Group, Aberdeen Plant

2. PROJECT
Line 1 and Line 2 Fryer controlled by ESP

3. MAILING ADDRESS	CITY	STATE ID	ZIP
624 Simplot Loop, P. O. Box 460	Aberdeen		83210

4. FACILITY CONTACT	TITLE	TELEPHONE
Kirk Adkins	Environmental supervisor, Aberdeen	(208) 397-2508

5. RESPONSIBLE OFFICIAL	TITLE	TELEPHONE
Bruce Hauber	Unit director, Aberdeen	(208) 397-2508

6. EXACT PLANT LOCATION	COUNTY
½ mile east of Highway 39 within the city limits of Aberdeen	Bingham

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS
Frozen potato and corn processor

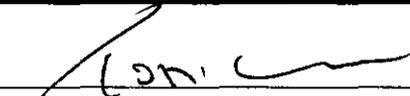
8. GENERAL CONDITIONS

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

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the Department of Environmental Quality (DEQ) or its officers, agents, or employees, assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment.

This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented with its application. Changes of design or equipment may require DEQ approval pursuant to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200, et seq.



TONI HARDESTY, DIRECTOR
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: April 21, 2006

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Acronyms, Units, and Chemical Nomenclature

AQCR	Air Quality Control Region
CFR	Code of Federal Regulations
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
MMlb/mo	million pounds per month
MMlb/yr	million pounds per any consecutive 12-month period
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
Rules	Rules for the Control of Air Pollution in Idaho
SIC	Standard Industrial Classification
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound
WESP	wet electrostatic precipitator

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050313

Permittee:	J. R. Simplot Company, Food Group, Aberdeen Facility	Facility ID No. 011-00029	Date Issued:	April 21, 2006
Location:	½ mile east of Hwy 39, Aberdeen			

1. PERMIT TO CONSTRUCT SCOPE

Purpose

- 1.1 This permit to construct (PTC) revises the facility's existing permit for the Line 1 fryer to include permit conditions for the Line 2 fryer and the wet electrostatic precipitator (WESP). Both emissions from the Line 1 and the Line 2 fryers combine to exhaust through the WESP.
- 1.2 This PTC replaces PTC No. 011-00029, issued on June 8, 1999, the terms and conditions of which no longer apply.

Regulated Sources

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

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Section	Source Description	Emissions Control(s)
2	Line 1 and Line 2 fryers	Wet electrostatic precipitator (WESP)

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2. LINE 1 AND LINE 2 FRYERS

2.1 Process Description

The Aberdeen facility has two processing lines, designated Lines 1 and 2. Line 1, which primarily processes french fries, consists of a blancher, a dryer and a two-stage fryer system. Line 2, which primarily processes preformed fried products and corn fries, consists of only a blancher and fryer. The Line 2 fryer receives corn meal products from the corn meal extruder.

2.2 Emissions Control Description

The PM and PM₁₀ emissions from the Line 1 and Line 2 fryers are controlled by a wet electrostatic precipitator (WESP).

Table 2.1 FRYERS DESCRIPTION

Emissions Unit(s) / Process(es)	Emissions Control Device
Line 1 fryer	WESP
Line 2 fryer	

Emissions Limits

2.3 PM₁₀ Emission Limits

PM₁₀ emissions from the wet electrostatic precipitator stack shall not exceed 15.52 lb/hr or 44 tons per any consecutive 12-month period.

2.4 Visible Emissions

Visible emissions from the wet electrostatic precipitator or any stack, vent, or other functionally equivalent opening associated with the fryers 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

2.5 Throughput Limits

The maximum throughput of finished potato product from the Line 1 fryer shall not exceed 250 million pounds per any consecutive 12-month period. The maximum throughput of finished potato product from the Line 2 fryer shall not exceed 30 million pounds per any consecutive 12-month period.

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2.6 WESP

The wet electrostatic precipitator (WESP) shall be used to control emissions from the Line 1 and the Line 2 fryers when any fryer is operating.

2.7 Monitoring Equipment

The permittee shall install, calibrate, maintain, and operate, in accordance with manufacturer's specifications and recommendations, equipment to monitor the secondary voltage of the WESP and the quench water flow rate.

2.8 Operations and Maintenance Manual Requirements

Within 60 days after startup, the permittee shall have developed and O & M manual for the WESP that describes the procedures that will be followed to comply with General Provision 2 and the requirements for the WESP as contained in this permit. The O & M manual shall contain at a minimum, the following information: a general discussion of the operation of the WESP, operating procedures, normal operating ranges for the secondary voltage and the quench water flow rate, corrective action steps for when operation is not consistent with normal operating ranges, cleanup and maintenance procedures, and recordkeeping. The O & M manual shall remain on site at all times and shall be made available to DEQ representatives upon request.

Monitoring and Recordkeeping Requirements

2.9 Throughput Monitoring

The permittee shall monitor and record both monthly and each consecutive 12-month period the throughput of finished potato product from the Line 1 fryer and from the Line 2 fryer to demonstrate compliance with Permit Condition 2.5 of this permit. Throughput shall be recorded as million pounds per month (MMlb/mo) and million pounds per any consecutive 12-month period (MMlb/yr) and kept in a log at the facility for the most recent two year period. The log shall be made available to DEQ representatives upon request.

2.10 Operating Parameters

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

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

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2.11 PM₁₀ Performance Test

The permittee shall conduct a performance test to measure PM₁₀ emissions from the WESP in accordance with the procedures outlined in 40 CFR 60, Appendix A, Method 5 and Method 202, or a DEQ-approved alternative method, within 180 days of issuance of this permit. The performance testing will be conducted to demonstrate compliance with the hourly emission rate limit listed in Permit Condition 2.3.

During the performance test, the Line 1 and Line 2 fryers shall be operated at worst-case normal operating conditions. Worst-case normal conditions are those conditions of process material makeup and moisture and process procedures which are changeable or which could reasonably be expected to be encountered during the operation of the facility and which would result in the highest pollutant emissions from the facility.

If the PM₁₀ emissions rate measured in the initial compliance test is less than or equal to 75% of the emissions standard in Permit Condition 2.3, the permittee shall conduct a compliance test every five years. If the particulate matter emissions rate measured during the initial compliance test is greater than 75%, but less than or equal to 90% of the emissions standard in Permit Condition 2.3, a second test shall be required every three years. If the particulate matter emissions rate measured during the initial compliance test is greater than 90% of the emissions standard in Permit Condition 2.3, the permittee shall conduct a compliance test annually.

The performance test, and any subsequent performance tests conducted to demonstrate compliance, shall be performed in accordance with IDAPA 58.01.01.157 and the following requirements:

- Visible emissions from the WESP shall be observed during each performance test run using the methods specified in IDAPA 58.01.01.625.
- The throughput of finished potato products from each of the fryers shall be recorded in pounds per hour (lb/hr) during each performance test.
- Monitor and record secondary voltage
- Monitor and record quench water flow rate

2.12 Compliance Test Protocol

The permittee is encouraged to submit a test protocol to DEQ for approval at least 30 days prior to each compliance test required in Permit Condition 2.11 to DEQ for approval at least 30 days prior to the test days. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the test does not satisfy the testing requirements.

2.13 Compliance Test Report

The permittee shall submit a report of the results of each compliance test required in Permit Condition 2.11, including all required process data, to DEQ within 30 days after the date on which the stack sampling is concluded.

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2.14 General Provision No. 5 Applicability

Permit to Construct No. P-050313 is being issued for existing process and control equipment. Therefore, General Provision No. 5 of this permit is not applicable to this permitting action.

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3. 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.
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 furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211.01 and 211.03:
 - A notification of the date of initiation of construction, within five working days after occurrence;
 - A notification of the date of completion/cessation of construction, within five working days after occurrence;
 - 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;
 - 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
6. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

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All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

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.
8. In accordance with IDAPA 58.01.01.123, 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.