



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502
www.deq.idaho.gov

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

August 31, 2018

William Riebesell, COO
Agropur, Inc. dba Jerome Cheese Company
547 W. Nez Perce
Jerome, ID 83338

RE: Facility ID No. 053-00003, Agropur, Inc. dba Jerome Cheese Company, Jerome
Final permit letter, DEQ-initiated permit reissuance

Dear Mr. Riebesell:

The Department of Environmental Quality (DEQ) is reissuing Permit to Construct (PTC) No. P-2014.0035 Project 62094, to Agropur, Inc. dba Jerome Cheese Company to list new throughput limits (in Permit Condition 2.5) established during performance testing required by the previously issued permit, in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho).

This permit is effective immediately and replaces PTC No. P-2014.0035, issued on September 25, 2014. This permit does not release Agropur, Inc. dba Jerome Cheese Company from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances. The accompanying Statement of Basis document remains unchanged.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Bobby Dye, Regional Manager – Air Quality and Remediation, at (208) 736-2190 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 Morrie Lewis at (208) 373-0502 or Morrie.Lewis@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 fluid and cursive, with a large initial "M" and a long, sweeping underline.

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS/ML

Enclosure

Permit No. P-2014.0035 Project 62094

Air Quality

PERMIT TO CONSTRUCT

Permittee	Agropur Inc. dba Jerome Cheese Co.
Permit Number	P-2014.0035
Project ID	62094
Facility ID	053-00003
Facility Location	547 W. Nez Perce Ave. Jerome, ID 83338

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 31, 2018



Morrie Lewis, Permit Writer



Mike Simon, Stationary Source Manager

Contents

1 Permit Scope.....3

2 Stork Friesland, Coulter, and CPS Dryers.....4

3 Natural Gas Fuel Burning Equipment7

4 General Provisions.....8

1 Permit Scope

Purpose

- 1.1 This is a revised permit to construct to reduce throughput rate limits (Permit Condition 2.5) consistent with those achieved during performance testing, in accordance with IDAPA 58.01.01.157.02.
- 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-2014.0035, issued on September 25, 2014.

Regulated Sources

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

Table 1.1 Regulated Sources

Permit Section	Source	Control Equipment
2	Stork Friesland dryer	Scrubber
2	Coulter dryer	Primary and Secondary Baghouses
2	CPS dryer	Baghouse
2	CPS Fluid	Baghouse
3	Johnson Boiler #1, Johnson Boiler #2, and 20 MMBtu/hr CPS burner (all natural gas)	None

2 Stork Friesland, Coulter, and CPS Dryers

2.1 Process Description

The dryers reduce the moisture content of the whey (or other condensed food product).

2.2 Control Device Descriptions

Table 2.1 Stork Friesland, Coulter, and CPS Dryers Description

Emissions Units / Processes	Control Devices	Emission Points
Stork Friesland dryer	Scrubber	Stork Friesland dryer stack
Coulter dryer	Baghouses (Primary and Secondary)	Coulter dryer stacks
CPS dryer	Baghouse	CPS dryer stack
CPS fluid bed	Baghouse	CPS fluid bed stack

Emission Limits

2.3 Emission Limits

The PM₁₀ emissions from the Stork Friesland dryer, the Coulter dryer, the CPS dryer, and the CPS fluid bed shall not exceed any corresponding emissions rate limits listed in Table 2.2.

Table 2.2 Stork Friesland, Coulter, and CPS Dryers Emission Limits ^(a)

Source Description	PM ₁₀ ^(b)	
	lb/hr ^(c)	T/yr ^(d)
Stork Friesland dryer	1.67	7.32
Coulter dryer	0.38	1.67
CPS dryer	3.71	12.9
CPS fluid bed	1.67	5.8

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.

2.4 Opacity Limit

Emissions from the Stork Friesland dryer, the Coulter dryer, the CPS dryer, and the CPS fluid bed stack, or any other stack, vent, or functionally equivalent opening associated with the Stork Friesland dryer, the Coulter dryer, the CPS dryer, and the CPS fluid bed, 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 average wet feed rate of the Stork Friesland dryer shall not exceed 17,432 lb/hr.
- The maximum average wet feed rate to the Coulter dryer shall not exceed 5,743 lb/hr.
- The maximum average wet feed rate to the CPS dryer shall not exceed 26,113 lb/hr.

[8/31/18]

2.6 Control Equipment

The permittee shall have developed an O & M manual for the Coulter dryer baghouse and the Stork Friesland dryer scrubber that will be followed and comply with General Compliance General Provision.

The permittee shall have developed an O&M manual for the CPS dryer and fluid bed baghouses. The O&M manual shall be based on the baghouse manufacturer's specifications and recommendations and shall describe the methods and procedures that will be followed to assure the baghouse is maintained in good working order and operated as efficiently as practical. The O & M manual shall be updated as necessary and shall include, at a minimum, the most recent general descriptions of the equipment; the normal operating conditions and procedures for the equipment; startup, shutdown, and maintenance procedures; upset conditions guidelines; and corrective action procedures. 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

2.7 Performance Tests

The permittee shall conduct a PM₁₀ performance test for the Stork Friesland dryer, the Coulter dryer, the CPS dryer, and the CPS fluid bed no later than March 21, 2023, and at least once every five years thereafter to demonstrate compliance with the PM₁₀ emission limits in Permit Condition 2.3. The tests shall be conducted in accordance with , EPA Methods 5 and 202, or Methods 201a and 202 as found in 40 CFR 60, Appendix A and 40 CFR 51, Appendix M, or a DEQ-approved alternative method. The tests shall be conducted to demonstrate compliance with the pound per hour PM₁₀ emissions limit in Permit Condition 2.3 and the Performance Testing General Provision. The following information shall be recorded during each performance test run and shall be included in the performance test report:

- The wet feed rate to the dryers.
- The differential pressure across the baghouses.
- Visible emissions shall be observed and recorded using the methods specified in IDAPA 58.01.01.625.

All performance testing shall be conducted in accordance with the Performance Testing General Provision.

[8/31/18]

2.8 Throughput Monitoring

Each dryer's throughput limit shall be calculated by dividing the total amount of wet feed in pounds to each dryer during a 24-hour period by 24.

The permittee shall monitor and record the maximum average hourly feed rate (lb/hr) for each dryer on a daily basis using the 24-hour periods of operation to demonstrate compliance with Permit Condition 2.5.

2.9 Opacity Monitoring

The permittee shall conduct a weekly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions to demonstrate compliance with Permit Condition 2.4. 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.

Reporting Requirements

2.10 Records Retention and Reporting

Records of information required by Permit Conditions 2.3 through 2.9 shall remain on site for the most recent five-year period and shall be made available to DEQ representatives upon request.

3 Natural Gas Fuel Burning Equipment

3.1 Process Description

The two 33.5 MMBtu/hr natural gas-fired boilers (Johnson Boilers #1 and #2) and 20 MMBtu/hr natural gas burner for the CPS dryer are used to generate steam and/or hot air used to reduce the moisture content of the whey (or other condensed food product) to produce a powder.

3.2 Control Device Descriptions

There are no controls for the emissions of the natural gas-fired boilers or natural gas burner for the CPS dryer.

Emission Limits

3.3 Emission Limits

Particulate matter emissions from the boilers and burner's exhaust stack shall not exceed 0.015 grains per dry standard cubic foot of effluent gas adjusted to 3% oxygen by volume.

Operating Requirements

3.4 Throughput Limits

The boilers and the burner shall burn natural gas exclusively.

3.5 Throughput Monitoring

The permittee shall monitor and record the amount of natural gas burned in each of the boilers, as required by 40 CFR 60.48c(g) on a daily basis. Each month, the permittee shall compile the monthly records into a rolling sum for the most recent 12-month period. A compilation of the most recent five years of records shall be kept on site and shall be made available to DEQ representatives upon request.

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; and
- A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211.01, 5/1/94]

- 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 58.01.01.211.03, 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 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, 4/11/15]

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]