STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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www.deq.idaho.gov

Governor Brad Little
Director John H. Tippets

December 6, 2019

Brian Gustaveson, Rexburg Facility Manager
Rexburg Facility of Basic American Foods, a Division of Basic American, Inc.
40 East 7th North
Rexburg, ID 83440

RE: Facility ID No. 065-00008 Rexburg Facility of Basic American Foods, a Division of Basic American, Inc., Rexburg
Final Permit Letter

Dear Mr. Gustaveson:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2011.0132 Project 62264 to Rexburg Facility of Basic American Foods, a Division of Basic American, Inc. located at Rexburg for installing a flake production line and air makeup units, replacing a boiler and a belt dryer, and increasing production. 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 July 11, 2019 and on all relevant comments received on DEQ's proposed permit during the public comment period.

This permit is effective immediately and replaces PTC No. P-2011.0132 Project 62057, issued on May 11, 2018, and terminates PTC No. P 2011.0132 project 62134, issued on May 17, 2019. This permit does not release Rexburg Facility of Basic American Foods, a Division of Basic American, Inc. from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

This PTC was processed in accordance with IDAPA 58.01.01.209.05.c. In accordance with IDAPA 58.01.01.381.03.b, so long as the change does not violate any terms or conditions of the existing Tier I permit, you may operate the source described in the PTC immediately upon submittal of your request for a Tier I administrative amendment.

Pursuant to the Construction and Operation Notification General Provision of your permit, it is required that construction and operation notification be provided. Please provide this information as listed to DEQ's Idaho Falls Regional Office, 900 N. Skyline Drive, Suite B, Fax (208) 528-2695.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a permit handoff meeting with Rensay Owen, Regional Air Quality Manager, at (208) 528-2650 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.

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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 Shawnee Chen at (208) 373-0502 or shawnee.chen@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

MS\syc

Permit No. P-2011.0132 PROJ 62264

Enclosures

Air Quality

PERMIT TO CONSTRUCT

Permittee	Rexburg Facility of Basic American Foods, a Division of Basic American, Inc.
Permit Number	P-2011.0132
Project ID	62264
Facility ID	065-00008
Facility Location	40 East 7th North Rexburg, ID 83440

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 December 6, 2019

Shawnee Chen, PE, Permit Writer

Mike Simon, Stationary Source Manager

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1 Permit Scope

Purpose

1.1 This permitting action modifies PTC No. P-2011.0132 Project 62057, issued on May 11, 2018. It is for installing a new flake production line, two new boilers, a natural-gas fired belt dryer, and several air makeup units, for increasing Process A production, and for removing a boiler and a steam-heated belt dryer from Process B.

[12/6/2019]

1.2 Those permit conditions that have been 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 terminates PTC No. P-2011.0132 project 62134, issued on May 17, 2019 and modifies and replaces PTC No. P-2011.0132 Project 62057, issued on May 11, 2018.

[12/6/2019]

Regulated Sources

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

Table 1.1 Regulated Sources

Permit Section	Source ID	Source Descriptions	Emission Controls
Boilers			
3	Kipper & Sons Boiler (also called the Kipper boiler)	Manufacturer: Kipper & Sons Model: N/A S/N: 1300 Heat input rating: 90.0 MMBtu/hr Maximum steam production rate: 65,000 lb/hr Permitted annual steam production rate: 189,800,000 lb/yr Fuel: wood Date installed: 1981	Multiclone and wet Scrubber in series
4	Boiler 1A	Manufacturer: Indeck Keystone Model: KD3.0068 Type D Heat input rating: 98 MMBtu/hr Maximum steam production rate: 80,600 lb/hr Fuel: natural gas only Date of construction: 2018	Low-NO_x burner
	Boiler 2A	Manufacturer: Indeck Keystone Model: KD3.0068 Type D Heat input rating: 98 MMBtu/hr Maximum steam production rate: 80,600 lb/hr Fuel: natural gas only Date of construction: 2018	Low-NO_x burner
	Boiler 2	Manufacturer: Murray Model: MCF3-43 S/N: 10509 Heat input rating: 49.9 MMBtu/hr Maximum steam production rate: 40,000 lb/hr Fuel: natural gas only Date installed: 2010	None
Process A			
5	7020	Cooler/Dryer 7020 (Cooler vent)	None
	7101	Cooler/Dryer 7101 (Dryer, 6.5 MMBtu/hr, natural gas-fired)	None

Permit Section	Source ID		Source Descriptions	Emission Controls
	7102		Cooler/Dryer 7102 (Dryer, 6.5 MMBtu/hr, natural gas-fired)	None
	7019		Cooler/Dryer 7019 (Dryer, 6.6 MMBtu/hr, steam and natural gas)	None
	7001		Cooler/Dryer 7001 (Dryer, steam-heated)	None
	7027		Cooler/Dryer 7027 (Cooler)	None
	7006		Material Recovery Unit 7006	None
Process B				
6	Proctor 4 Dryer		Proctor 4 Dryer, 2000 lb/hr, natural gas fired Stage A: 8.8 MMBtu/hr (Winnox 0200 burner) Stages BCD: 8.8 MMBtu/hr (Winnox 0200 burner) and 2.0 MMBtu/hr (Winnox 0100 burner)	Low-NO_x burners
	5034		Material Recovery Unit 5034	None
	5037		Cooler/Dryer 5037 (Cooler/dryer vent, dryer is steam heated)	None
	4000		Cooler/Dryer 4000 (Dryer, steam heated)	None
6	228		Cooler/Dryer 228 (Dryer, natural gas-fired, 16.1 MMBtu/hr)	None
	234		Cooler/Dryer 234 (Second exhaust from dryer 228)	None
	707		Material Recovery Unit 707 (fabric filter)	None
	725		Material Recovery Unit 725 (fabric filter)	None
	8		Material Recovery Unit 8 (fabric filter)	None
	5001		Material Recovery Unit 5001	None
	5000		Material Recovery Unit 5000 (fabric filter)	None
	432		Material Recovery Unit 432 (fabric filter)	None
	322		Material Recovery Unit 322	None
	572		Material Recovery Unit 572 (vent from material recovery cyclone in animal feed load-out system)	None
	33		Vegetable Dryer M33 (Dryer, natural gas-fired, 2.7 MMBtu/hr)	None
	44		Vegetable Dryer M44 (Dryer, natural gas-fired, 2.75 MMBtu/hr)	None
	56		Vegetable Dryer M56 (Dryer, natural gas-fired, 1.6 MMBtu/hr)	None
	62		Vegetable Dryer M62 (Dryer, natural gas-fired, 1.6 MMBtu/hr)	None
	86		Vegetable Dryer M86 (Dryer, steam heated)	None
	Flk-N	Flake Drum #1	Manufacturer: Idaho Steel Products Model: 8FT X 21FT DRUM Installed date: 2018 Dryer, steam-heated, 3,000 lb/hr	MicroMist Scrubber System Manufacturer: EnviroCare International Model No.: MicroMist $PM_{10}/PM_{2.5}$ removal efficiency: 75%
		Flake Drum #2	Identical with Flake Drum #1	
	Flk-S	Flake Drum #3	Identical with Flake Drum #1	MicroMist Scrubber System Manufacturer: EnviroCare International Model No.: MicroMist $PM_{10}/PM_{2.5}$ removal efficiency: 75%
		Flake Drum #4	Identical with Flake Drum #1	
7	Flake North Air Makeup Unit (AMU) #1		Flake Air Makeup Unit #1, 4.86MMBtu/hr	Low-NO_x burner
	Flake North AMU #2		Flake Air Makeup Unit #2, 4.86 MMBtu/hr	Low-NO_x burner
	Flake South AMU#3		Flake Wet Process Air Makeup Unit #3, 2.86 MMBtu/hr	Low-NO_x burner
	SLAB AMU#4		SLAB Air Makeup Unit #4, 1.29 MMBtu/hr	Low-NO_x burner
	Potato Cleaning AMU#5		Potato Cleaning Air Makeup Unit #5, 0.72 MMBtu/hr	Low-NO_x burner

Permit Section	Source ID	Source Descriptions	Emission Controls
	Boiler Room North AMU#6	Boiler Room Air Makeup Unit #6, 2.5 MMBtu/hr	Low-NO_x burner
	Boiler Room South AMU#7	Boiler Room Air Makeup Unit #7, 2.5 MMBtu/hr	Low-NO_x burner
	NA	Plant Space Heaters (27.8 MMBtu/hr)	None
	RX-OBI1	Reyco Unit (13.3 MMBtu/hr), installed in 2014	None

[12/6/2019]

2 Facility-Wide Conditions

2.1 Facility-Wide Requirements

Reserved (The Tier I operating permit contains facility-wide conditions that apply to this facility.)

2.2 Performance Testing

If performance testing is required, the following test methods shall be used unless otherwise specified in this permit or approved by DEQ in accordance with IDAPA 58.01.01.157.02:

Table 2.1 Test Methods

Pollutant	Test Method	Additional Requirements
$PM_{2.5}$ and PM_{10}	EPA Methods 5 / 202, or 201A / 202	Particulate matter with an aerodynamic diameter less than or equal to a 2.5 and 10 micrometers (respectively), including condensable particulate as defined in IDAPA 58.01.01.006.
NO_x	EPA Method 7E	---
CO	EPA Method 10	---

[12/6/2019]

3 Kipper Boiler

3.1 Process Description

The Kipper boiler is a wood and coal-fired boiler with an original steam production rating of 60,000 pounds per hour. The boiler can burn up to 39% coal on a fuel weight basis (i.e. 50% of the heating value). The Kipper boiler was installed in 1981, and an economizer was added in 2001, increasing the maximum steam production rate to 65,000 lb/hr due to increased boiler efficiency. Emission controls on the Kipper boiler include a Zurn multiclone dust collector and a Riley Ventri-Rod® scrubber in series.

The permittee has requested to eliminate the option of burning coal, and therefore the use of coal as a fuel to Kipper boiler shall be made inoperative. In addition, the permittee has also requested that the Kipper boiler is used as a backup or standby boiler with an annual steam production limit of 189,800,000 pound per year and that the Kipper boiler will not operate concurrently with Boiler 2.

[12/6/2019]

3.2 Control Device Descriptions

Table 3.1 Emissions Unit and Emissions Control Device

Emissions Units / Processes	Control Devices
Kipper Boiler	Zurn multiclone and Riley Ventri-Rod® scrubber in series

Emission Limits

3.3 Emissions Limits

The emissions from the Kipper boiler stack shall not exceed any corresponding emissions rate limits listed in Table 3.2.

Table 3.2 Kipper Boiler Emission Limits [a]

$PM_{2.5}/PM_{10}$ [b]		NO_x	
lb/hr [c]	T/yr [d]	lb/hr [c]	T/yr [d]
13.6	19.8	21.6	31.5

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. Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 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.

[12/6/2019]

3.4 Reserved

3.5 Fuel Burning Equipment - PM

Particulate matter emissions from the Kipper boiler shall not exceed 0.080 gr/dscf corrected to 8% oxygen when burning wood fuel.

[12/6/2019]

Operating Requirements

3.6 Kipper Boiler Fuel Type

The permittee shall exclusively combust wood in the Kipper boiler.

[12/6/2019]

3.7 Decommission Coal as Fuel

Equipment to use coal as a fuel to Kipper boiler shall be inoperative no later than 60 days after the permit issuance. The permittee shall notice DEQ Idaho Falls Regional office after this is achieved.

[12/6/2019]

3.8 Steam Production

- The Kipper boiler steam production rate shall not exceed 65,000 pounds of steam per hour on a 24-hour rolling average.
- The Kipper boiler steam production rate shall not exceed 189,800,000 pounds of steam per any consecutive 12-month period.

[12/6/2019]

3.9 Ventri-Rod® Scrubber and Multiclone

The permittee shall install, maintain, and operate a multiclone and a wet scrubber on the Kipper boiler to control the emissions of PM, PM_{10} and $PM_{2.5}$.

[12/6/2019]

3.10 Operation Requirement

The Kipper boiler shall not operate concurrently with Boiler 2.

[12/6/2019]

3.11 Boiler, Ventri-Rod® Scrubber, and Multiclone Annual Inspection and Maintenance

At least once per calendar year, the permittee shall inspect the internal workings of the Kipper boiler and perform any maintenance required to maintain efficient combustion. The permittee shall also inspect the Ventri-Rod® scrubber and multiclone and perform any maintenance required. The permittee shall maintain records of the boiler, Ventri-Rod® scrubber, and multiclone maintenance conducted to comply with this permit condition. The records shall provide the date the inspection was conducted and a description of the maintenance performed on the boiler to maintain combustion efficiency.

[5/11/18]

3.12-3.13 40 CFR 63 Subpart JJJJJJ Operating Requirements

Reserved (The Tier I operating permit contains federally-applicable NESHAP Subpart JJJJJJ operating requirements that apply to this facility.)

[5/11/18]

3.14 Fuel Requirement

Wood materials combusted in the Kipper Boiler shall be either "clean cellulosic biomass" (as defined in 40 CFR 241.2) or fuels produced from the processing of discarded non-hazardous secondary materials and that meet the legitimacy criteria specified in 40 CFR 241.3(d)(1). If wood materials that do not meet these requirements are combusted in the Kipper boiler, the permittee shall comply with applicable provisions for units combusting non-hazardous solid waste enacted in accordance with 40 CFR 60, Subpart DDDDD.

Monitoring and Recordkeeping Requirements

3.15 Steam Monitoring

- The steam produced in the boiler shall be monitored and recorded at least once per hour in units of pounds of steam per hour and average pounds of steam per hour per rolling 24-hour period.
- Every month, the permittee shall record the steam produced in the month and record the steam produced in the previous consecutive 12-month period.

[12/6/2019]

3.16 Operation Requirement Monitoring

The permittee shall keep records, such as Kipper boiler and Boiler 2 steaming production records containing date and time to demonstrate that the Kipper boiler does not operate concurrently with Boiler 2.

[12/6/2019]

3.17-3.26 CAM 40 CFR 64 Monitoring and Recordkeeping Requirements

Reserved (The Tier I operating permit contains federally-applicable NESHAP Subpart JJJJJJ monitoring and recordkeeping requirements that apply to this facility.)

[5/11/18]

3.27 NESHAP 40 CFR 63 Subpart JJJJJJ Monitoring and Recordkeeping Requirements

Reserved (The Tier I operating permit contains federally-applicable NESHAP Subpart JJJJJJ monitoring and recordkeeping requirements that apply to this facility.)

[5/11/18]

Performance Testing Requirements

3.28 NOx and CO Performance Test

Within five years of the permit issuance and at such other times as may be required by the Director, the permittee shall conduct a performance test to measure NOx and CO emissions from the Kipper boiler stack to demonstrate compliance with the NOx limits in Emissions Limits permit condition and to verify CO emissions factor (EF) that is equal to or less than 0.669 lb/MMBtu, or 0.927 lb CO/1,000 lbs steam, whichever is more stringent. The test shall be conducted in accordance with the procedures outlined in Performance Test permit condition (i.e., Permit Condition 2.2). The performance test and any subsequent performance tests conducted to demonstrate compliance shall be performed in accordance with IDAPA 58.01.01.157. In addition, the following information shall be recorded during each performance test run and included in the performance test report:

- The boiler steaming rate;
- The boiler shall be operated at the worst case normal production rate during the performance test. A description of how this requirement was met shall be included in the performance test report;
- The measured NOx and CO emission rates shall be reported in units of pounds per hour. All calculations used to convert the test results into these units shall be provided in the test report; and

- The quantity of wood shall be reported by weight (in units of tons/hr) or by gross heat content (in units of MMBtu/hr and Btu/lb). The methods used to obtain these values and to make these determinations shall be described.

3.29 PM and PM_{10} Performance Tests

Within 10 years of the permit issuance and at such other times as may be required by the Director, the permittee shall conduct a performance test to measure PM and PM_{10} emissions from the Kipper boiler stack to demonstrate compliance with the PM emissions standard in the Fuel Burning Equipment – PM permit condition and the $PM_{10}/PM_{2.5}$ emissions limits in Emissions Limits permit condition.

The tests shall be conducted in accordance with the procedures outlined in Performance Test permit condition (i.e., Permit Condition 2.2). The performance tests conducted to demonstrate compliance shall be performed in accordance with IDAPA 58.01.01.157. In addition, the following information shall be recorded during each performance test run and included in the performance test report:

- The boiler steaming rate;
- The static air pressure and water pressure at the wet Ventri-Rod® scrubber;
- The pressure drop across the multiclone;
- The quantity of wood shall be reported, either by weight (in units of tons/hr) or by gross heat content (in units of MMBtu/hr and Btu/lb). The methods used to obtain these values shall be described.

The boiler shall be operated at the worst case normal production rate during the performance test. A description of how this requirement was met shall be included in the performance test report. Visible emissions shall be observed and recorded using the methods specified in IDAPA 58.01.01.625. In addition to correcting the Method 5 test results to 8% oxygen, the Method 5 results shall be corrected for altitude as required by IDAPA 58.01.01.680 to demonstrate compliance with the fuel burning equipment particulate matter standard.

[12/6/2019]

Reporting Requirements

3.30 Reserved

3.31 CAM 40 CFR 64 Reporting Requirements

Reserved (The Tier I operating permit contains federally-applicable CAM monitoring and recordkeeping requirements that apply to this facility.)

[5/11/18]

3.32 NESHAP 40 CFR 63, Subpart JJJJJJ Reporting Requirements

Reserved (The Tier I operating permit contains federally-applicable NESHAP Subpart JJJJJJ reporting requirements that apply to this facility.)

[5/11/18]

4 Boiler 2, Boiler 1A, and Boiler 2A

4.1 Process Description

Steam is produced in the boilers to run drying processes in Process A and Process B. Boiler 1A and Boiler 2A are the primary boilers, with Boiler 2 and Kipper Boiler providing backup or standby capacity. Boiler 2 will not operate concurrently with the Kipper boiler.

Table 4.1 describes the devices used to control emissions from Boiler 1A, Boiler 2A, and Boiler 2.

[12/6/2019]

4.2 Control Device Descriptions

Table 4.1 Boilers Description

Emissions Units / Processes	Control Devices
Boiler 1A	Low-NO_x burner
Boiler 2A	Low-NO_x burner
Boiler 2	None

[12/6/2019]

Emission Limits

4.3 Emission Limits

Emissions from each boiler stack shall not exceed any corresponding emission rate limit in the following table.

Table 4.2 Emission Limits [a]

Source Description		$PM_{2.5}$ [b] lb/hr [d]	PM_{10} [c] lb/hr [d]	NO_x lb/hr [d]
Boiler 1A Stack	Boiler 1A	0.73	0.73	1.79
	Emissions from AMUs allocated to Boiler 1A stack	0.001	0.001	0.103
Boiler 2A Stack	Boiler 2A	0.73	0.73	1.79
	Emissions from AMUs allocated to Boiler 2A stack	0.001	0.001	0.103
Boiler 2 Stack	Boiler 2	0.37	0.37	4.89

a) In absence of any other credible evidence, compliance is assured by complying with permit operating, monitoring, and record keeping requirements.
b) Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.
c) Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.
d) 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.
e) Tons per any consecutive 12-month period.

[12/6/2019]

4.4 Fuel Burning Equipment - PM

Particulate matter emissions from each boiler stack (Boiler 2, Boiler 1A, and Boiler 2A) shall not exceed 0.015 gr/dscf corrected to 3% oxygen when burning natural gas, in accordance with IDAPA 58.01.01.676-677.

[12/6/2019]

4.5 Boiler Annual Inspection and Maintenance

At least once per calendar year or per a DEQ-approved schedule, the permittee shall tune and adjust the burner systems of Boiler 2, Boiler 1A, and Boiler 2A to maintain efficient combustion.

The permittee shall maintain records of the boiler tuning conducted to comply with this permit condition. The records shall provide the date the tuning was conducted and a description of the adjustments made to the boiler to maintain combustion efficiency.

[12/6/2019]

4.6 Natural Gas Combustion Monitoring

The permittee shall install, calibrate, maintain, and operate equipment to measure the quantity of natural gas combusted in Boiler 2, Boiler 1A, and Boiler 2A. The natural gas combustion data is used in the facility-wide CO emission calculation in the monitoring and recordkeeping requirements of the CO Facility-Wide Emissions Limit section (Section 8). The following quantities of natural gas combusted shall be monitored and recorded each calendar month in units of million standard cubic feet (MMscf) per month and MMscf per rolling 12-calendar month period:

- Total gas combusted at the Rexburg facility
- Total gas combusted by Boilers 1A and 2A (G_{B1A2A})

[12/6/2019]

- Gas combusted by Boiler 2 (G_{B2})

[12/6/2019]

- Each rolling 12-calendar month calculation shall be the summation of the quantities of gas combusted in that calendar month and in each of the preceding 11 calendar months.

Performance Testing Requirements

4.7 Initial Performance Test

Within 180 days after initial startup, the permittee shall conduct performance tests to measure NO_x emissions from either Boiler 1A or Boiler 2A to demonstrate compliance with the corresponding boiler pound per hour emission rate limit (Permit Condition 4.3). Tests shall be conducted in accordance with the procedures outlined in the performance testing requirements (Permit Conditions 2.2 and 4.8 and General Provisions 9.7 through 9.9) or as otherwise approved by DEQ. The performance test monitoring parameters (Permit Condition 4.8) shall be recorded during each performance test run and included in the performance test report. The boiler shall be operated at the worst-case normal production rate during the performance test. A description of how this requirement was met shall be included in the performance test report.

[12/6/2019]

4.8 Performance Test Monitoring

The permittee shall monitor and record the following parameters during each performance test:

- The steaming rate in pounds of steam per hour (lb/hr) every 15 minutes.

[12/6/2019]

Monitoring, Recordkeeping, and Reporting Requirements

4.9-4.10 NSPS 40 CFR 60 Monitoring, Recordkeeping, and Reporting Requirements

Reserved (The Tier I operating permit contains federally-applicable NSPS Subpart Dc monitoring, recordkeeping, and reporting requirements that apply to this facility.)

[5/11/18]

5 Process A (Drying Process and Material Transfer Systems)

5.1 Process Description

The Basic American Foods Rexburg facility produces a variety of dehydrated food products for external customers and for internal use. Products include potato granules, formulated dehydrated food products, dehydrated whole and piece food products, and animal feed. Raw materials into the process are cooked potatoes, cooked foods, dehydrated foods, and additives, including sulfites. The processes addressed by this section are listed in Table 5.1 and include coolers, dryers, dehydration lines, and material transfer systems. Emissions of PM from each of these sources are uncontrolled. Material Recovery Units (MRUs), in the form of cyclones and fabric filters, are integral process equipment used to separate the pneumatically conveyed product from the air stream. Drying heat is provided by both natural gas combustion and steam produced by the plant boilers. Process A was constructed in the early 1960's. This permitting action increases production limits of Process A from 61 T/day to 65 T/day.

[12/6/2019]

5.2 Control Device Descriptions

Table 5.1 Process A Description

Emissions Units / Processes	Control Devices	Emission Points
Cooler/Dryer 7020 (Cooler vent)	None	7020
Cooler/Dryer 7101 (Dryer, 6.5 MMBtu/hr, natural gas-fired)	None	7101
Cooler/Dryer 7102 (Dryer, 6.5 MMBtu/hr, natural gas-fired)	None	7102
Cooler/Dryer 7019 (Dryer, 6.6 MMBtu/hr, steam and natural gas)	None	7019
Cooler/Dryer 7001 (Dryer, steam-heated)	None	7001
Cooler/Dryer 7027 (Cooler)	None	7027
Material Recovery Unit 7006	None	7006

Emission Limits

5.3 Emission Limits

Emissions from the drying process and material transfer system stacks shall not exceed any corresponding emissions rate limits listed in the following table.

Table 5.2 Dryer Process and Material Transfer System PM_{10} Emissions Limits

Source Description		$PM_{2.5}$ [b] lb/hr [d]	PM_{10} [c] lb/hr [d]	NO_x lb/hr [d]
Cooler/Dryer stack 7101	Cooler/Dryer 7101	2.345	2.345	0.332
	Emissions from AMUs allocated to Cooler/Dryer 7101 stack	0.019	0.019	0.156
Cooler/Dryer stack 7102	Cooler/Dryer 7102	2.345	2.345	0.332
	Emissions from AMUs allocated to Cooler/Dryer 7102 stack	0.018	0.018	0.155
Cooler/Dryer stack 7019	Cooler/Dryer 7019	0.894	0.894	0.337
	Emissions from AMUs allocated to Cooler/Dryer 7019	0.013	0.013	0.113

a) In absence of any other credible evidence, compliance is assured by complying with permit operating, monitoring, and record keeping requirements.
b) Particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.
c) Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.
d) 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.

[12/6/2019]

Operating Requirements

5.4 Production Limits

The production of dried products, including additives, from Process A shall not exceed 65 tons per 24-hour work day.

[12/6/2019]

5.5 Dryer Fuels

Each dryer shall combust only natural gas or be heated by steam from the plant boilers.

5.6 Process Identification

Process line A shall be identified by one or more signs posted on or near the process line. Each cooler or dryer shall also be identified in a manner that will allow an inspector to identify the equipment that corresponds to the equipment listed in the Process A Description table (Table 5.1).

Monitoring, Recordkeeping, and Reporting Requirements

5.7 Production Monitoring

The permittee shall monitor and record, on a daily basis, the calendar date and the total product output of dried food products (known as "Production from New Inputs"), in tons per day, from Process A. Daily production records may be maintained on a work-day basis, in which a work day commences at a specific time of day.

6 Process B (Drying Process and Material Transfer Systems)

6.1 Process Description

The Basic American Foods Rexburg facility produces a variety of dehydrated food products for external customers and for internal use. Products include potato granules, formulated dehydrated food products, dehydrated whole and piece food products, and animal feed. Raw materials into the process are cooked potatoes, cooked foods, dehydrated foods, and additives, including sulfites. The processes addressed by this section are listed in Table 6.1 and include coolers, dryers, dehydration lines, and material transfer systems. Emissions of PM from each of these sources are uncontrolled. Material Recovery Units (MRUs), in the form of cyclones and fabric filters, are integral process equipment used to separate the pneumatically conveyed product from the air stream. Drying heat is provided by both natural gas combustion and steam produced by the plant boilers.

6.2 Control Device Descriptions

Table 6.1 Process B Description

Emissions Units / Processes		Control Devices	Emission Points
Material Recovery Unit 5034		None	5034
Cooler/Dryer 5037 (Cooler/dryer vent, dryer is steam heated)		None	5037
Cooler/Dryer 4000 (Dryer, steam heated)		None	4000
Cooler/Dryer 234/228 (Dryer, natural gas-fired, 16.1 MMBtu/hr)		None	234/228
Material Recovery Unit 707 (fabric filter)		None	707
Material Recovery Unit 725 (fabric filter)		None	725
Material Recovery Unit 8 (fabric filter)		None	8
Material Recovery Unit 5001		None	5001
Material Recovery Unit 5000 (fabric filter)		None	5000
Material Recovery Unit 432 (fabric filter)		None	432
Material Recovery Unit 322		None	322
Material Recovery Unit 572 (Vent from material recovery cyclone in animal feed load-out system)		None	572
Vegetable Dryer M33 (Dryer, natural gas-fired, 2.7 MMBtu/hr)		None	33
Vegetable Dryer M44 (Dryer, natural gas-fired, 2.75 MMBtu/hr)		None	44
Vegetable Dryer M56 (Dryer, natural gas-fired, 1.6 MMBtu/hr)		None	56
Vegetable Dryer M62 (Dryer, natural gas-fired, 1.6 MMBtu/hr)		None	62
Vegetable Dryer M86 (Dryer, steam heated)		None	86
Flake North (flake drum dryers #1 and #2)		A MicroMist Scrubber System	FLK_N
Flake South (flake drum dryers #3 and #4)		A MicroMist Scrubber System	FLK_S
Proctor 4 Belt Dryer	Stage A	Low-NO_x burners	P4A
	Stages B, C, D		P4BCD

[12/6/2019]

Emission Limits

6.3 Emission Limits

Emissions from the drying process and material transfer system stacks shall not exceed any corresponding emissions rate limits listed in the following table.

Table 6.2 Dryer Process and Material Transfer System Emissions Limits [a]

Source Description			$PM_{2.5}/PM_{10}$ lb/hr [b]	NO_x lb/hr [b]
Flake North MicroMist Scrubber System scrubber stack		Flake North (Flake Drum #1 and Flake Drum #2)	0.453	0.00
		Emissions from AMUs allocated to the scrubber stack	0.033	0.271
Flake South MicroMist Scrubber System scrubber stack		Flake South (Flake Drum #3 and Flake Drum #4)	0.453	0.00
		Emissions from AMUs allocated to the scrubber stack	0.033	0.271
Proctor 4 Belt Dryer	Stage A stack	Proctor 4 Belt Dryer Stage A	0.415	0.267
		Emissions from AMUs allocated to Stage A stack	0.013	0.111
	Stages BCD stack	Proctor 4 Belt Dryer Stages B, C, D	1.726	0.267
		Emissions from AMUs allocated to Stages BCD stack	0.013	0.111
Cooler/Dryer 4000 (Dryer, steam heated) exhaust		Cooler/Dryer 4000	1.720	0.00
		Emissions from AMUs allocated to Cooler/Dryer 4000 exhaust	0.019	0.164
Cooler/Dryer 228 exhaust		Cooler/Dryer 228	1.100	0.480
		Emissions from AMUs allocated to Cooler/Dryer 228 exhaust	0.011	0.096
Cooler/Dryer 234 exhaust (Second exhaust from dryer 228)		Cooler/Dryer 234	0.310	0.320
		Emissions from AMUs allocated to Cooler/Dryer 234 exhaust	0.017	0.143
Stack group 33,44, 56, 62, and 86		Stack group 33,44, 56, 62, and 86	0.860	0.260
		Emissions from AMUs allocated to stack group 33,44, 56, 62, and 86	0.043	0.121

a In absence of any other credible evidence, compliance is ensured by complying with permit operating, monitoring, and record keeping requirements.

b 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.

[12/6/2019]

Operating Requirements

6.4 Production Limits

The total production of dried products, including additives, from Process B shall not exceed 448 tons per 24-hour work day, including flake products. The flake line production shall not exceed 144 tons per 24-hour work day.

[12/6/2019]

6.5 Dryer Fuels

Each dryer shall combust only natural gas or be heated by steam from the plant boilers.

6.6 Process Identification

Process line B shall be identified by one or more signs posted on or near the process line. Each cooler or dryer shall also be identified in a manner that will allow an inspector to identify the equipment that corresponds to the equipment listed in the Process B Description table (Table 6.1).

6.7 MicroMist Scrubber System

The permittee shall install and operate two MicroMist scrubber systems each with 75% or more removal efficiency for all particulates, including PM_{10} and $PM_{2.5}$.

Each of the two MicroMist scrubber systems shall treat the exhaust from two steam-heated flake drum dryers of the four steam-heated drum dryers as described in Table 6.1.

[12/6/2019]

6.8 MicroMist Scrubber System Operating Parameters

Each scrubber's operating parameter shall be equal to or greater than the value obtained during the most recent performance test demonstrating compliance with the emissions limits. Until an initial performance test demonstrating compliance with emissions limits is completed, each scrubber's operating parameter shall be equal to or greater than the respective values specified in the following:

- The liquid flow rate to the spray lances at quench stage shall be equal to or greater than 315 gallons per minute (gpm).
- The pressure drop across the MicroMist Venturi (MMV) stage shall be maintained between 17 to 25 inches of water (iwg).
- The inlet liquid flow rate to MMV stage shall be equal to or greater than 328 gpm.

The permittee shall install and operate the monitoring devices to measure the above parameters.

[12/6/2019]

Monitoring, Recordkeeping, and Reporting Requirements

6.9 Production Monitoring

The permittee shall monitor and record, on a daily basis, the calendar date and the total product output of dried food products including additives (known as "Production from New Inputs"), in tons per day, from Process B. Daily production records may be maintained on a work-day basis, in which a work day commences at a specific time of day.

6.10 MicroMist Scrubber System Operating Parameters Monitoring

The permittee shall monitor and record the following operating parameters for each MicroMist scrubber system once each week:

- The liquid flow rate to the spray lances at quench stage in gpm
- The pressure drop across the MicroMist Venturi (MMV) stage in inches of water.
- The inlet liquid flow rate to MMV stage in gpm.

[12/6/2019]

Performance Testing Requirements

6.11 Initial Performance Test for PM_{10}

Proctor 4 belt dryer

Within 180 days after initial startup of Proctor 4 belt dryer, the permittee shall conduct performance tests to measure PM_{10} emissions from Proctor 4 belt dryer's two stacks to demonstrate compliance with the PM_{10} emission limits for the two stacks and to verify the emissions factors used in the emissions inventories (EI) calculation for Proctor 4 belt dryer.

MicroMist scrubber system scrubber stack

Within 180 days after initial startup of flake production, the permittee shall conduct performance tests to measure PM_{10} emissions from one MicroMist scrubber system scrubber stack (either Flake North or Flake South) to demonstrate compliance with the PM_{10} emission limit for the scrubber stack and to verify the emissions factor used in the emissions inventories (EI) calculation for the flake drum dryers.

Tests shall be conducted in accordance with the procedures outlined in the performance testing requirements (Permit Conditions 2.2 and 6.12, and General Provisions 9.7 through 9.9) or as otherwise approved by DEQ. The performance test monitoring parameters (Permit Condition 6.12) shall be recorded during each performance test run and included in the performance test report. The flake drum and dryer shall be operated at the worst-case normal production rate during the performance tests. A description of how this requirement was met shall be included in the performance test report.

[12/6/2019]

6.12 Performance Test Monitoring

The permittee shall monitor and record the following parameters during each performance test:

- The production rate(s) from the specific Process B emissions unit(s) (i.e., flake drum dryers, or Proctor 4 belt dryer) tested in tons of product per hour (T/hr) during each test run.
- The liquid flow rate to the spray lances at quench stage in gpm during the flake drum dryer test. The liquid flow rate shall be monitored and recorded at least once every 15 minutes of sampling time.
- The pressure drop across the MicroMist Venturi (MMV) stage in iwg during the flake drum dryer test. The pressure drop shall be monitored and recorded at least once every 15 minutes of sampling time.
- The inlet liquid flow rate to MMV stage in gpm during the flake drum dryer test. The liquid flow rate shall be monitored and recorded at least once every 15 minutes of sampling time.

[12/6/2019]

7 Plant Space Heaters

7.1 Process Description

The BAF Rexburg Facility has numerous existing space heaters ranging in size from less than 100,000 Btu/hr to 8.8 MMBtu/hr, with a total combustion capacity of 30.8 MMBtu/hr. Most of the units provide direct heating; i.e., the combustion air from the unit is discharged directly into the room to provide heating. In addition, in 2014 BAF installed Reyco unit (RX-OBI1), a natural-gas fired space heater rated at 13.3 MMBtu/hr. New air makeup units at a total rate of 19.6 MMBtu/hr are proposed to be installed for this project.

[12/6/2019]

Emission Limits

7.2 Emission Limits

Space heaters emissions are allocated to the process stacks used for modeling analysis. Emissions from plant space heaters are regulated in Table 5.2 and Table 6.2 of the permit and by Permit Condition 8.1.

[12/6/2019]

8 Facility-Wide CO Emission Limit

8.1 Facility-Wide CO PTE Calculation and Notification

Whenever a new source is installed that emits CO, the permittee shall calculate facility-wide CO PTE and submit the revised facility-wide CO PTE to DEQ no later than 60 days of the installation, or within DEQ approved alternative timeframe.

The submittal shall be titled "Facility-wide CO PTE Change Notification for Rexburg Facility of Basic American Foods, a Division of Basic American, Inc. 065-00008"

[12/6/2019]

9 General Provisions

General Compliance

9.1 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.]

9.2 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]

9.3 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

9.4 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

9.5 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]

9.6 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

9.7 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.

9.8 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.

9.9 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 and 4/11/15]

Monitoring and Recordkeeping

9.10 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

9.11 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

9.12 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

9.13 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

9.14 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

9.15 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

9.16 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]