



STATE OF IDAHO

DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

Brad Little, Governor
John Tippetts, Director

August 6, 2020

Steve Brockett, Idaho Campus Environmental Manager
Shelley Facility of Basic American Foods, a Division of Basic American, Inc.
415 West Collins Road
Blackfoot, Idaho 83221

RE: Facility ID No. 011-00020, Shelley Facility of Basic American Foods, a Division of Basic American, Inc., Blackfoot
Final Permit Letter

Dear Mr. Brockett:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2011.0131 Project 62436 to Shelley Facility of Basic American Foods, a Division of Basic American, Inc., located at Blackfoot to install a temporary boiler and remove Boilers 1, 3, 5, and the P6-1 dryer. The facility classification will also change from an A to SM80 upon implementation of this PTC no longer requiring a Tier 1 operating permit. Therefore, please request termination of the facility's Tier 1 operating permit upon implementation of this PTC. Please provide this information as listed to DEQ's State Office, 1410 N. Hilton, Boise, Idaho 83201, (208) 236-6160. 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 April 27, 2020.

This permit is effective immediately and replaces PTC No. P-2011.0131 issued on May 2, 2019. This permit does not release Shelley 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.

Pursuant to the Construction and Operation Notification General Provision of your permit, it is required that construction and operation notification be provided. In addition, provide notification that Boilers 1, 3, 5, and the P6-1 dryer have been removed or rendered inoperable as required by this PTC. Please provide this information as listed to DEQ's Pocatello Regional Office, 444 Hospital Way #300, Pocatello, Idaho 83201, (208) 236-6160.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a permit handoff meeting with Melissa Gibbs, Regional Air Quality Manager, at (208) 236-6160 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.

Mr. Brockett, Idaho Campus Environmental Manager
August 6, 2020
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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 Christina Boulay at (208) 373-0502 or christina.boulay@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,



Mike Simon
Stationary Source Bureau Chief
Air Quality Division

MS\cb

Permit No. P-2011.0131 PROJ 62436

Enclosures

Air Quality

PERMIT TO CONSTRUCT

Permittee Shelley Facility of Basic American Foods, A Division of Basic American, Inc.

Permit Number P-2011.0131

Project ID 62436

Facility ID 011-00020

Facility Location 434 S. Emerson
Shelley, Idaho 83274

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 6, 2020

Christina Boulay

Christina Boulay, Permit Writer

Mike Simon

Mike Simon, Stationary Source Bureau Chief

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1 Permit Scope

Purpose

- 1.1 This is a modified permit to construct (PTC) to install a temporary boiler and remove Boilers 1, 3, 5, and the P6-1 dryer. After issuance of this permit the facility will change from an air quality classification of A (major facility), to SM80, (synthetic minor) classification, and have a facility-wide CO emissions limit of 99 T/yr.
- 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-2011.0131 issued on May 2, 2019.

Regulated Sources

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	Boiler 4	Manufacturer: Cleaver-Brooks Model: DL-76-RH S/N: W-3511 (not labeled as S/N) Heat input rating: 72.1 MMBtu/hr Maximum steam production rate: 60,000 lb/hr Fuels: Natural Gas Date installed: 1990	None
	Temporary Boiler	Manufacturer: Cleaver-Brooks Model: NOS-2A-67-650-HC-NH S/N: RT-4477 Heat input rating: 98.6 MMBtu/hr Maximum steam production rate: 67,500 lb/hr Fuels: Natural Gas Date installed: 2017	None

Table 1.1 Regulated Sources (continued)

Permit Section	Source ID	Source Descriptions	Emission Controls
Process A			
4	P3-1	Dryer - 20 MMBtu/hr, natural gas-fired	None
	P3-2	Dryer - 0.5 MMBtu/hr, natural gas-fired	None
	P3-3	Material recovery unit	None
	P4-1	Dryer - 20 MMBtu/hr, natural gas-fired	None
	P4-2	Dryer - 0.5 MMBtu/hr, natural gas-fired	None
	P4-3	Material recovery unit	None
	P5-1	Purifier	None
	P5-2	Purifier	None
Process B			
5	P6-2	Cooler	None
	P8-1	Dryer - Steam-heated	None
	P8-2	Dryer - Steam-heated	None
	P8-VE	Material recovery unit	None
	P8-VW	Material recovery unit	None
	P9-1	Dryer - Steam heated	None
	P10-1	Dryer - Steam heated	None
	P11-1	Dryer - Steam heated	None
	PKG-1	Material recovery unit on packaging line	None
	PKG-2	Material recovery unit on packaging line	None
	MT-2	Material recovery unit to animal feed storage	None
	MT-3	Material recovery unit to bulk storage	None
Plant Heaters			
6		Natural gas space heaters	None

[8/6/2020]

2 Facility-Wide Conditions

Facility-Wide CO Emission Limit

2.1 Facility-Wide CO Emission Limit

The permittee shall emit no more than 99 tons per year (tpy) of CO. For purposes of complying with this requirement, a year is defined as any consecutive 12-month period.

[8/6/2020]

2.2 Boilers 1, 3, 5, and P6-1 Dryer Removal or Render Inoperable Requirement

The permittee shall physically remove or permanently render inoperable, Boilers 1, 3, 5, and the P6-1 dryer, such that these emission units no longer have the potential to emit of any regulated air pollutant.

[8/6/2020]

Monitoring, Recordkeeping, and Reporting Requirements

2.3 Facility-Wide CO Emission Limit Monitoring, Recordkeeping, and Reporting Requirements

The permittee shall track all CO emissions on a monthly basis and use the previous 12-consecutive months to demonstrate compliance with the annual CO T/yr emission limit.

[8/6/2020]

Notification Requirements

2.4 Boiler's 1, 3, 5, and P6-1 Dryer Removal or Render Inoperable Notification Requirement

The permittee shall notify the Pocatello Regional Office that Boilers 1, 3, 5, and the P6-1 dryer have all been removed or rendered inoperable, to demonstrate compliance with the Boilers 1, 3, 5, and P6-1 Dryer Removal or Render Inoperable Requirement Permit Condition.

[8/6/2020]

3 Boiler 4 and Temporary Boiler

3.1 Process Description

Boiler 4 and the temporary boiler provide process steam for the Shelley plant. All boilers are natural gas-fired. Boiler 4 is a Cleaver-Brooks boiler with a rated heat input of 72.1 MMBtu/hr, installed in 1989. Boiler 4 and the temporary boiler are applicable to 40 CFR 60 Subpart Dc. The temporary boiler is a Cleaver-Brooks boiler with a rated heat input of 98.6 MMBtu/hr, installed in 2017. The boilers shall not be run simultaneously; only one boiler shall run at a time.

[8/6/2020]

3.2 Control Device Descriptions

Table 3.1 Boiler 4 and the Temporary Boiler Description

Emissions Units / Processes	Emission Unit Description	Control Devices	Emission Points
Boiler 4	Cleaver-Brooks, 72.1 MMBtu/hr	None	Boiler 4 stack
Temporary Boiler	Cleaver-Brooks, 98.6 MMBtu/hr	Low-NO _x Flu-Gas Recirculation Burners	Temporary Boiler stack

[8/6/2020]

Emission Limits

3.3 Emission Limits

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

Table 3.2 Boiler 4 and the Temporary Boiler Emission Limits^(a)

Source Description	PM _{2.5} /PM ₁₀ ^(b)		SO ₂		NO _x		CO		VOC	
	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)
Boiler 4	0.55	2.40	0.13	0.74	10.16	44.40	11.26	49.20	1.28	5.60
Temporary Boiler	0.04	0.15	0.06	0.20	3.59	12.59	3.65	12.77	0.53	1.86

- 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 two point five (2.5) and 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.

[8/6/2020]

3.4 Opacity Limit

Emissions from the Boiler stacks, or any other stack, vent, or functionally equivalent opening associated with the Boilers, 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.

[8/6/2020]

Operating Requirements

3.5 Natural Gas Combustion

Boilers shall combust only natural gas.

3.6 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 4, and the temporary boiler 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.

3.7 Boiler 4 and Temporary Boiler Operations

Boiler 4 and the temporary boiler shall not operate simultaneously. Only one boiler shall operate at a time.

[8/6/2020]

Monitoring and Recordkeeping Requirements

3.8 Natural Gas Usage Monitoring

The permittee shall install, calibrate, maintain, and operate equipment to measure the quantity of natural gas combusted in each boiler. The permittee shall monitor and record the fuel usage for all boilers on a daily basis using available data. The permittee shall use the emission factors listed in the appendices of this permit, or other emission factors approved by DEQ, to calculate emissions and ensure compliance with hourly and annual emission limits.

[12/29/2017]

3.9 New Source Performance Standards for Boiler 4 and the Temporary Boiler

Boiler 4 and the temporary boiler are subject to NSPS Subpart Dc, the permittee shall record and maintain records of the amounts of fuel combusted per calendar month, in accordance with 40 CFR 60.48c(g)(2).

[8/6/2020]

3.10 Boiler 4 and Temporary Boiler Operations Monitoring and Recordkeeping

The permittee shall keep a daily log of Boiler 4 and the Temporary Boiler operations to demonstrate compliance with the Boiler 4 and Temporary Boiler Operations permit condition.

[8/6/2020]

Performance Testing Requirements

3.11 New Source Performance Standards

The permittee shall submit notification of the date of construction or reconstruction and actual startup to EPA and DEQ for any NSPS-affected natural gas boiler installed after the date of issuance of this permit in accordance with 40 CFR 60.48c.

[6/4/2009]

The permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of each NSPS-affected natural gas boiler, unless an alternative monitoring plan is approved by EPA. In such case, the permittee may follow the EPA approved monitoring plan.

[6/4/2009]

4 Process A (Drying Process and Material Transfer Systems)

4.1 Process Description

The Shelley facility uses a variety of drying and dehydration processes. Potato granules and dehydrated piece products are dried by contact with heated air. Drying heat is provided by natural gas combustion. Raw material input to the process is cooked potatoes and food additives, including sulfites. Air suspension unit processes are also used to classify materials and to remove unsuitable fractions from the production stream.

The emissions units addressed by this section are listed in Table 4.1 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.

Table 4.1 Process A Emission Unit Description

Emissions Units	Emissions Unit Description	Emissions Control Device	Emissions Point
P3-1	Dryer, 20 MMBtu/hr, natural gas-fired	None	P3-1
P3-2	Dryer, 0.5 MMBtu/hr, natural gas-fired	None	P3-2
P3-3	Material recovery unit	None	P3-3
P4-1	Dryer, 20 MMBtu/hr, natural gas-fired	None	P4-1
P4-2	Dryer, 0.5 MMBtu/hr, natural gas-fired	None	P4-2
P4-3	Material recovery unit	None	P4-3
P5-1	Purifier	None	P5-1
P5-2	Purifier	None	P5-2

[12/29/2017]

Emission Limits

4.2 Emission Limits

The emissions from the Process A stack shall not exceed any corresponding emissions rate limits listed in Table 4.2.

Table 4.2 Process A Emission Limits ^(a)

Source Description	PM ₁₀ /PM _{2.5} ^(b)		SO ₂		NO _x		CO	
	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)
P3-1	3.12	13.67	0.29	1.26	1.22	5.34	5.20	22.78
P3-2	0.10	0.43	0.01	0.06	0.03	0.13	0.13	0.57
P3-3	0.01	0.03						
P4-1	3.12	13.67	0.29	1.26	1.22	5.34	5.20	22.78
P4-2	0.10	0.43	0.01	0.06	0.03	0.13	0.13	0.57
P4-3	0.01	0.03						
P5-1	0.02	0.08						
P5-2	0.02	0.08						

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

[5/2/2019]

4.3 Opacity Limit

Emissions from the Process A stack, or any other stack, vent, or functionally equivalent opening associated with the Process A, 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

4.4 Dryer Fuels

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

4.5 Process Identification

Process line A shall be identified by 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 Table 4.1.

Monitoring and Recordkeeping Requirements

4.6 Dried Food Products Throughput Monitoring

The permittee shall monitor and record on a daily basis, the calendar date and the product output of dried food products, including additives, (known as “Production from New Inputs”), in pounds per day, from each Process A emission unit when in operation. The permittee shall use the emission factors listed in the appendices of this permit, or other emission factors approved by DEQ, to calculate emissions and ensure compliance with hourly and annual emission limits.

[12/29/2017]

4.7 Natural Gas Monitoring

The permittee shall monitor and record on a daily basis, the calendar date and the total dryer natural gas usage from Process A. The permittee shall use the emission factors listed in the appendices of this permit, or other emission factors approved by DEQ, to calculate emissions and ensure compliance with hourly and annual emission limits. The permittee does not need to record the natural gas usage for individual dryers because the emission factors are the same for natural gas combustion in all dryers.

[12/29/2017]

5 Process B (Drying Process and Material Transfer Systems)

5.1 Process Description

The Shelley facility uses a variety of drying and dehydration processes. Potato granules and dehydrated piece products are dried by contact with heated air. Drying heat is provided by natural gas combustion. Raw material input to the process is cooked potatoes and food additives, including sulfites. Air suspension unit processes are also used to classify materials and to remove unsuitable fractions from the production stream.

Potato flakes are produced by drying a thin film of cooked potatoes directly on a steam-heated drum. The heat from the drum evaporates the moisture from the flakes, producing a thin sheet of dried potatoes. This sheet is then broken and crushed to produce flake products.

The facility operates packaging equipment to fill product containers with bulk product. Spices and flavorings may be added to the bulk product during the packaging process. Dust pickups located within the packaging area exhaust to the atmosphere through baghouses.

The emissions units 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 B was initially established in the 1960's, with significant additions in 1972 (the P8 stacks), 1986 (the P6-1 and P6-2 stacks), and 1990 (the P9-1, P10-1, and P11-1 stacks). P6-1 dryer was removed in this permitting action.

5.2 Control Device Descriptions

Table 5.1 Process B Emission Unit Description

Emissions Units / Processes	Emission Unit Description	Control Devices	Emission Points
P8-1	Dryer – Steam-heated	None	P8-1A, P8-1S, P8-1N
P8-2	Dryer – Steam-heated	None	P8-2A, P8-2S, P8-2N
P8-VE	Material recovery unit	None	P8-VE
P8-VW	Material recovery unit	None	P8-VW
P9-1	Dryer – Steam heated	None	P9-1
P10-1	Dryer – Steam heated	None	P10-1
P11-1	Dryer – Steam heated	None	P11-1
PKG-1	Material recovery unit on packaging line	None	PKG-1
PKG-2	Material recovery unit on packaging line	None	PKG-2
MT-2	Material recovery unit to animal feed storage	None	MT-2
MT-3	Material recovery unit to bulk storage	None	MT-3

[8/6/2020]

Emission Limits

5.3 Emission Limits

The emissions from the Process B stack shall not exceed any corresponding emissions rate limits listed in Table 5.2.

Table 5.2 Process B Emission Limits^(a)

Source Description	PM ₁₀ /PM _{2.5} ^(b)		SO ₂		NO _x		CO	
	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)
P8-1N	0.15	0.65	0.04	0.18				
P8-1S	0.15	0.65	0.04	0.18				
P8-1A	0.03	0.14						
P8-2N	0.15	0.65	0.04	0.18				
P8-2S	0.15	0.65	0.04	0.18				
P8-2A	0.03	0.14						
P8-VE	0.07	0.32						
P8-VW	0.07	0.32						
P9-1	1.65	7.23	0.17	0.73				
P10-1	1.65	7.23	0.17	0.73				
P11-1	1.65	7.23	0.17	0.73				
PKG-2	0.05	0.24						
PKG-1	--	--						
MT-3	0.01	0.05						
MT-2	0.07	--						

- 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 two point five (2.5) and 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.

[8/6/2020]

5.4 Opacity Limit

Emissions from the Process B stack, or any other stack, vent, or functionally equivalent opening associated with the 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.

Operating Requirements

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 B shall be identified by 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 Table 5.1.

Monitoring and Recordkeeping Requirements

5.7 Dried Food Products Throughput Monitoring

The permittee shall monitor and record on a daily basis, the calendar date and the product output of dried food products, including additives, (known as “Production from New Inputs”), in pounds per day, from each Process B emission unit when in operation. The permittee shall use the emission factors listed in the appendices of this permit, or other emission factors approved by DEQ, to calculate emissions and ensure compliance with hourly and annual emission limits.

[12/29/2017]

5.8 Natural Gas Usage Monitoring

The permittee shall monitor and record on a daily basis, the calendar date and the total dryer natural gas usage from Process B. The permittee shall use the emission factors listed in the appendices of this permit, or other emission factors approved by DEQ, to calculate emissions and ensure compliance with hourly and annual emission limits. The permittee does not need to record the natural gas usage for individual dryers because the emission factors are the same for natural gas combustion in all dryers.

[12/29/2017]

6 Plant Space Heaters

6.1 Process Description

The BAF Shelley Facility has natural gas-fired space heaters ranging in size from less than 200,000 Btu/hr to 7.5 MMBtu/hr. At the time of permit issuance total space heater combustion capacity is 59.5 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.

Emission Limits

6.2 Emission Limits

The emissions from the Plant Space Heaters stack shall not exceed any corresponding emissions rate limits listed in Table 6.1.

Table 6.1 Plant Space Heaters Emission Limits ^(a)

Source Description	PM ₁₀ /PM _{2.5} ^(b)		SO ₂		NO _x		CO	
	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)
Plant Space Heaters ^(e) (combined)	0.44	0.97	0.14	0.31	5.83	12.78	4.90	10.73

- 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.
- e) Emission limits for use of plant space heaters is for a combined total from all gas fired space heaters.

[12/29/2017]

Monitoring and Recordkeeping Requirements

6.3 Natural Gas Usage Monitoring

The permittee shall monitor and record on a daily basis, the calendar date and the total amount natural gas usage from plant spaces heaters. Gas combusted in plant space heaters will be calculated as the difference of total facility gas usage less gas combusted in boilers, Process A and Process B. The permittee shall use the emission factors listed in the appendices of this permit, or other emission factors approved by DEQ, to calculate emissions and ensure compliance with hourly and annual emission limits.

[12/29/2017]

7 General Provisions

General Compliance

7.1 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.]

7.2 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, 5/1/1994]

7.3 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, 5/1/1994]

Inspection and Entry

7.4 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

7.5 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, 5/1/1994]

7.6 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, 5/1/1994]

- 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, 5/1/1994]

Performance Testing

7.7 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.

7.8 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.

7.9 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, 4/5/2000 and 4/11/2015]

Monitoring and Recordkeeping

7.10 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, 5/1/1994]

Excess Emissions

7.11 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, 4/5/2000]

Certification

7.12 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, 5/1/1994]

False Statements

7.13 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, 3/23/1998]

Tampering

7.14 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, 3/23/1998]

Transferability

7.15 This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

[IDAPA 58.01.01.209.06, 4/11/2006]

Severability

7.16 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, 5/1/1994]