



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

C.L. "Butch" Otter, Governor
Toni Hardesty, Director

February 24, 2011

Thomas Campone, Chief Operating Officer
Rupert Cogeneration Partners, Ltd.
41 S. Prospect Avenue
Park Ridge, IL 60068

RE: Facility ID No. 067-00012, Rupert Cogeneration Partners, Ltd, Rupert
Facility ID No. 039-00017, Glens Ferry Cogeneration Partners, Ltd., Glens Ferry
Transfer of Ownership of PTCs

Dear Mr. Campone,

This letter acknowledges receipt on January 27, 2011 for the transfer of ownership for two permits to construct (PTC), in accordance with IDAPA 58.01.01.209.04 (Rules for the Control of Air Pollution in Idaho). The transfer of ownership request is for PTC No. P-040401, issued on April 9, 2004, PTC No. P-050402, issued on February 10, 2006, and is based on the following information:

Current Permittee Information

Permittee: Rupert Cogeneration Partners, Ltd.
Mailing Address: 811 South Oneida, Rupert, Idaho 83347
Responsible Official: Chris Harriman, Plant Manager
Phone Number: (208) 436-1596
Person to Contact: Chris Harriman, Plant Manager
Phone Number: (208) 436-1596

Proposed Permittee Information

Permittee: Rupert Cogeneration Partners, Ltd.
Mailing Address: 41 S. Prospect Avenue, Park Ridge, IL 60068
Responsible Official: Thomas Campone, Chief Operating Officer, tcampone@eogllc.net
Phone Number: (847) 514-1024 (cell)
Person to Contact: Joe Nelson, Supervisor O&M, jnelson@bhgen.com (this will change)
Phone Number: (208) 436-1596

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Person to Contact: Joe Nelson, Supervisor O&M, jnelson@bhgen.com (this will change)
Phone Number: (208) 436-1596

DEQ is only revising the cover pages of the two permits to construct. All other information in the permits remains the same.

Attached to this letter is revised PTCs No.'s P-2008.0141 and P-2008.0142 with the revised pages reflecting the transfer of ownership. The effective date of the PTC transfer is February 24, 2011. DEQ recommends that you maintain a copy of this letter for your records.

This transfer does not release Rupert Cogeneration Partnership, Ltd. or Glens Ferry Cogeneration Partners, Ltd. from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances. If you have any questions, please contact Harbi Elshafei at 208.373.0502 or harbi.elshafei@deq.idaho.gov.

Sincerely,



Mike Simon
Stationary Source Program Manager
Air Quality Division

Attachment

MS/HE

Permit No. P-2008.0141 PROJ 60785 and Permit No. P-2008.0142 PROJ 60786

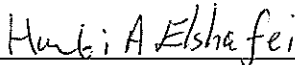
<p style="text-align: center;">Air Quality PERMIT TO CONSTRUCT State of Idaho Department of Environmental Quality</p>	PERMIT NUMBER	CLASS	SIC
	P-2008.0141	SM	4911
	FACILITY ID	AQCR	NAICS
	067-00012	63	221119
	ZONE	UTM COORDINATES (km)	
12	281.0	4721.2	
PERMITTEE			
Rupert Cogeneration Partners, Ltd.			
PROJECT			
Project No. 60785, Cogeneration Facility, PTC Revision			
MAILING ADDRESS	CITY	STATE	ZIP
41 S. Prospect Avenue	Park Ridge	IL	60068
FACILITY CONTACT	TITLE	TELEPHONE	
Joe Nelson	Supervisor O&M	(208) 436-1596	
RESPONSIBLE OFFICIAL	TITLE	TELEPHONE	
Thomas Campone	Chief Operating Officer	(847) 514-1024 (cell)	
EXACT PLANT LOCATION		COUNTY	
811 South Oneida, Rupert, Idaho 83347		Minidoka	
GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS			
Power Generation – Electricity and Steam			
PERMIT AUTHORITY			
<p>This permit is issued according to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200 through 228, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed or modified by this permit.</p> <p>This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the Department of Environmental Quality (DEQ) or its officers, agents, or employees, assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment.</p> <p>This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.</p> <p>This permit has been granted on the basis of design information presented with its application. Changes in design, equipment or operations may be considered a modification. Modifications are subject to DEQ review in accordance with IDAPA 58.01.01.200 through 228 of the Rules for the Control of Air Pollution in Idaho.</p>			
		DATE ISSUED	February 24, 2011
HARBI ELSHAFFEL, PERMIT WRITER			
			
MIKE SIMON, STATIONARY SOURCE MANAGER			

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ACRONYMS, UNITS, and CHEMICAL NOMENCLATURE

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
Btu	British thermal units
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Idaho Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
HAPs	hazardous air pollutants
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
MMBtu/hr	million British thermal units per hour
MMcf/yr	million cubic feet per year
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
<i>Rules</i>	<i>Rules for the Control of Air Pollution in Idaho</i>
SIC	Standard Industrial Classification
SO ₂	sulfur dioxide
T/yr	tons per year
TAPs	toxic air pollutants
UTM	Universal Transverse Mercator
VOC	volatile organic compound

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-040401

Permittee:	Rupert Cogeneration Partners,	Facility ID No. 067-00012	Date Issued:	April 9, 2004
Location:	Rupert, Idaho			

1. PERMIT TO CONSTRUCT SCOPE***Purpose***

This PTC replaces the following permit, the terms and conditions of which no longer are in affect:

- PTC No. P-030400, issued October 21, 2003

Regulated Sources

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

Table 1.1 REGULATED EMISSIONS SOURCES

Permit Section	Source Description	Emissions Control(s)
2	Cogeneration Facility	SoLo NO _x Combustors

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Location: Rupert, Idaho		

2. EMISSIONS UNIT NO. 1 – COGENERATION FACILITY

2.1 Process Description

The primary purpose of the cogeneration facility is to generate electricity sold on the grid and export waste heat to heat recovery boilers that generate process steam for use by Idahoan Plant No. 3, owned and operated by Idaho Fresh-Pak, Inc.

2.2 Emissions Control Description

Emissions from the cogeneration facility are controlled by Solar Mars 100 SoLoNO_x combustors.

Table 2.1 COGENERATION FACILITY DESCRIPTION

Emissions Unit(s) / Process(es)	Emissions Control Device	Emissions Point
Cogeneration Facility	SoLo NO _x Combustors	Turbine Exhaust Stack

Emissions Limits

2.3 Emissions Limits

The SO₂, NO_x, and CO emissions from the cogeneration facility stack shall not exceed any corresponding emissions rate limits listed in Table 2.2.

Table 2.2 COGENERATION FACILITY EMISSIONS LIMITS*

Source Description	SO ₂		NO _x		CO	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Cogeneration Facility	0.722	3.16	18.28	80.07	12.22	53.52

*The permittee shall not exceed the T/yr listed based on any consecutive 12-month period.

2.4 Nitrogen Oxides Emissions Limits – NSPS Requirements

Nitrogen oxide emissions shall not exceed 0.0212% by volume of exhaust gas at 15% oxygen and on a dry basis as required by 40 CFR 60.332(a)(2).

2.5 Sulfur Dioxide Emissions Limits – NSPS Requirements

Sulfur dioxide emissions shall not exceed 0.015% by volume of exhaust gas at 15% oxygen and on a dry basis as required in 40 CFR 60.333(a).

2.6 Opacity Limit

Emissions from the turbine exhaust stack, or any other stack, vent, or functionally equivalent opening associated with the cogeneration facility, 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.

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Permittee: Rupert Cogeneration Partners,	Facility ID No. 067-00012	Date Issued: April 9, 2004
Location: Rupert, Idaho		

Operating Requirements

2.7 Fuel Type Limit

The turbine shall be fired by natural gas exclusively.

2.8 Fuel Combustion Limit

The maximum amount of fuel combusted in the turbine shall not exceed 1122.87 MMcf/yr for any consecutive 12-month period.

2.9 Fuel Sulfur Limit

The sulfur content on the fuel combusted in the turbine shall not exceed 0.8% by weight as required by 40 CFR 60.333(b).

2.10 Pollution Control Equipment Requirements

The turbine used at this facility shall utilize a Solar Mars SoLo NO_x low NO_x combustor, or equivalent, to control NO_x and CO emissions resulting from the combustion of natural gas in the turbine. An equivalent pollution control device may be used in place of the Solar Mars SoLo No_x combustor, so long as the manufacturer guarantees a NO_x and CO destruction efficiency of at least 80%.

2.11 Operating and Maintenance Plan Requirements

The permittee shall maintain, and update as necessary, an operating and maintenance plan for the turbine and low NO_x combustor used at this facility. The plan shall be based on the manufacturer's specification that will guarantee the NO_x and CO emissions rates listed in Permit Condition 2.3 of this permit. The plan shall be kept on-site and shall be made available to DEQ representatives upon request.

Monitoring and Recordkeeping Requirements

2.12 Fuel Consumption Monitoring and Recording Requirements

The permittee shall monitor and record the amount of natural gas combusted on a monthly and annual basis. The amounts shall be recorded as cubic feet per month and cubic feet per consecutive 12-month period and shall be recorded in a log. A compilation of the most recent two years of records shall be kept on site and shall be made available to DEQ representatives upon request.

2.13 Sulfur and Nitrogen Content of Fuel – NSPS Requirements

The permittee shall monitor the sulfur content and nitrogen content of the fuel being fired in the turbine as required by the alternative monitoring-approval from EPA, Region 10, dated February 11, 1997. The permittee shall comply with the reporting requirements contained in the February 11, 1997, approval letter.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-040401

Permittee: Rupert Cogeneration Partners,	Facility ID No. 067-00012	Date Issued:	April 9, 2004
Location: Rupert, Idaho			

Reporting Requirements

2.14 Certification of Documents

All documents, including but not limited to, records, supporting information, and monitoring data submitted to the DEQ 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 documents are true, accurate, and complete.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-040401

Permittee:	Rupert Cogeneration Partners,	Facility ID No. 067-00012	Date Issued:	April 9, 2004
Location:	Rupert, Idaho			

3. SUMMARY OF EMISSIONS LIMITS

Table 3.1 provides a summary of all emissions limits required by this permit:

Table 3.1 SUMMARY OF EMISSIONS LIMITS

Rupert Cogeneration Partners, Ltd., Rupert Emissions Limits ^a - Hourly (lb/hr) and Annual ^b (T/yr)						
Source Description	SO ₂		NO _x		CO	
	lb/hr	T/yr	lb/hr	T/yr	lb/hr	T/yr
Cogeneration Facility	0.722	3.16	18.28	80.07	12.22	53.52

^a As determined by a pollutant-specific EPA reference method, DEQ-approved alternative, or as determined by the DEQ's emissions estimation methods used in this permit analysis.

^b As determined by multiplying the actual or allowable (if actual is not available) pound-per-hour emissions rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates. The permittee shall not exceed the T/yr listed based on any consecutive 12-month period.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-040401

Permittee: Rupert Cogeneration Partners,	Facility ID No. 067-00012	Date Issued: April 9, 2004
Location: Rupert, Idaho		

4. PERMIT TO CONSTRUCT GENERAL PROVISIONS

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

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-040401

Permittee:	Rupert Cogeneration Partners,	Facility ID No. 067-00012	Date Issued:	April 9, 2004
Location:	Rupert, Idaho			

7. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

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