



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
Toni Hardesty, Director

June 2, 2005

Certified Mail No. 7000 1670 0013 8129 0102

David Thomas
General Manager
Gossner Foods, Inc., Magic Valley Division
1201 7th Street
Heyburn, ID 83336

RE: Facility ID No. 067-00023, Gossner Foods, Inc., Magic Valley Division, Heyburn
Final Permit Letter

Dear Mr. Thomas:

The Idaho Department of Environmental Quality (DEQ) is issuing Permit to Construct No. P-040425 for Gossner Foods, Inc., Magic Valley Division in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho). This permit is effective immediately.

This permit does not release Gossner Foods, Inc., Magic Valley Division from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

A representative of Twin Falls Regional Office will contact you regarding a meeting with DEQ to discuss the permit terms and requirements. DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Bill Rogers at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Martin Bauer, Administrator
Air Quality Division

MB/SYC/sd
Enclosures

Permit No. P-040425



**Air Quality
PERMIT TO CONSTRUCT**

**State of Idaho
Department of Environmental Quality**

PERMIT No.: P-040425

FACILITY ID No.: 067-00023

AQCR: 63

CLASS: B

SIC: 2022

ZONE: 12

UTM COORDINATE (km): 273.3, 4714.2

1. PERMITTEE

Gossner Foods, Inc., Magic Valley Division

2. PROJECT

Initial Permit to Construct

3. MAILING ADDRESS

1201 7th Street

CITY

Heyburn

STATE

ID

ZIP

83336

4. FACILITY CONTACT

David Thomas

TITLE

General Manager, Idaho
Operations

TELEPHONE

(435) 679-0860

5. RESPONSIBLE OFFICIAL

David Thomas

TITLE

General Manager, Idaho
Operations

TELEPHONE

(208) 679-0860

6. EXACT PLANT LOCATION

1201 7th Street, Heyburn, Idaho

COUNTY

Minidoka/Cassia

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Cheese production

8. GENERAL CONDITIONS

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

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

This permit is not transferable to another person, place, or piece or set of equipment. This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

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



**TONI HARDESTY, DIRECTOR
DEPARTMENT OF ENVIRONMENTAL QUALITY**

DATE ISSUED: June 2, 2005

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Acronyms, Units, and Chemical Nomenclature

acfm	actual cubic feet per minute
ASTM	American Society for Testing and Materials
AQCR	Air Quality Control Region
CFR	Code of Federal Regulations
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
°F	degrees Fahrenheit
ft	foot
gr	grain (1 lb = 7,000 grains)
gr/dscf	grains per dry standard cubic feet
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
kW	kilowatt
lb/day	pound per day
MMBtu/hr	million British thermal units per hour
NO _x	nitrogen oxides
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
SIC	Standard Industrial Classification
UTM	Universal Transverse Mercator

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-040425

Permittee:	Gossner Foods, Inc., Magic Valley Division	Facility ID No. 067-00023	Date Issued:	June 2, 2005
Location:	Heyburn, Idaho			

1. PERMIT TO CONSTRUCT SCOPE

Purpose

1.1 This permit to construct (PTC) allows for the construction of a cheese production facility in Heyburn, Idaho. This PTC is the facility's initial permit.

Regulated Sources

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

Table 1.1 SOURCES OF REGULATED EMISSIONS

Permit Section	Source Description	Emissions Control(s)
2	<p>Boiler 1 and Boiler 2 (Identical Sources)</p> <p>Manufacturer: Superior Model: Seminole 3-Pass Wetback Rated heat capacity: 25.106 MMBtu/hr Primary fuel type: natural gas Secondary fuel type: propane</p> <p><u>Stack Specifications</u></p> <p>Stack height (ft): 35.0 Stack diameter (ft): 2.0 Stack exhaust gas temperature (°F): 400 Stack exhaust gas flowrate (acfm): 8,544</p>	<p>NOx Emissions Control</p> <p>Manufacturer: Industrial Combustion Model: LND30-300P Emissions control type: flue gas recirculation NOx Control efficiency: 80%</p>
3	<p>Emergency Generator</p> <p>Output capacity (kW): 1,000 Fuel type: ASTM Grade 2 fuel oil</p>	None
4	<p>Roof-Mounted Heaters</p> <p><u>Heater 1</u></p> <p>Rated heat capacity: 1.7 MMBtu/hr Fuel type: natural gas</p> <p><u>Heater 2</u></p> <p>Rated heat capacity: 2.5 MMBtu/hr Fuel type: natural gas</p> <p><u>Heater 2</u></p> <p>Rated heat capacity: 1.2 MMBtu/hr Fuel type: natural gas</p>	None

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2. BOILER 1 AND BOILER 2 – GAS FIRED

2.1 Process Description

Boiler 1 and Boiler 2 produce and provide process steam for cheese production. The boilers can combust either natural gas (primary fuel) or propane gas (secondary fuel).

2.2 Emissions Control Description

Table 2.1 BOIERS DESCRIPTION

Emissions Unit(s) / Process(es)	Emissions Control Device	Emissions Point
Boiler 1	Flue gas recirculation system to control NO _x	Boiler 1 stack
Boiler 2	Flue gas recirculation system to control NO _x	Boiler 2 stack

Emissions Limits

2.3 Emissions Limits

PM₁₀ emissions from each boiler stack shall not exceed the corresponding emissions rate limits listed in Table 2.2.

Table 2.2 BOILER EMISSIONS LIMITS

Source Description	PM ₁₀
	lb/day
Boiler 1	4.01
Boiler 2	4.01

2.4 Opacity Limit

Emissions from each boiler stack, or any other stack, vent, or functionally equivalent opening associated with each boiler, 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.

2.5 Grain Loading Standard

PM emissions from each boiler stack shall not exceed 0.015 gr/dscf corrected to 3% oxygen by volume for gas.

Operating Requirements

2.6 Allowable Fuel

The boilers shall be fueled by natural gas or propane gas exclusively.

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2.7 Propane Gas Fuel Limit

The permittee shall combust in each boiler not more than 932,112 gallons of propane gas per any consecutive 12-month period.

2.8 Gas Flow Meter

Unless otherwise provided by EPA, the permittee shall install, calibrate, maintain, and operate, according to manufacturer's specifications and recommendations, a gas meter for each boiler to measure the amount gas fuel combusted.

Reporting and Recordkeeping Requirements

2.9 Monitoring and Recordkeeping Requirement

- In accordance with 40 CFR 60.48c(g), the permittee shall record and maintain records of the amounts of each fuel combusted in each boiler during each day. Records of this information shall be kept on site for the most recent two-year period and shall be made available to EPA or DEQ representatives upon request.
- The permittee shall monitor and record the amount of propane gas combusted in each boiler monthly and annually to demonstrate compliance with Permit Condition 2.7. The annual amounts of propane gas combusted shall be determined by summing monthly amounts over the previous consecutive 12-month period. Records of this information shall be kept on site for the most recent two-year period and shall be made available to DEQ representatives upon request.

2.10 Reporting Requirement

The permittee shall submit to EPA and DEQ notification of the date of construction or reconstruction, and actual startup of each boiler, as required by 40 CFR 60.7. This notification shall include the design heat input capacity of each boiler and the identification of fuels to be combusted in each boiler.

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3. EMERGENCY GENERATOR – DISTILLATE FUEL OIL-FIRED

3.1 Process Description

The emergency generator will be used to provide electrical power in the event of a power outage at the facility. The generator is rated at 1,000 kW and is fueled with distilled fuel oil.

3.2 Emissions Control Description

Emissions from the generator are uncontrolled.

Emissions Limits

3.3 Emissions Limits

PM₁₀ emissions from the emergency generator stack shall not exceed 6.46 pound per day.

3.4 Opacity Limit

Emissions from the emergency generator stack, or any other stack, vent, or functionally equivalent opening associated with the emergency generator, 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

3.5 Allowable Fuel

The emergency generator shall be fueled by distillate fuel oil exclusively.

3.6 Fuel Oil Sulfur Content

The permittee shall not use any distillate fuel oil containing more than the following percentages of sulfur:

- ASTM Grade 1 fuel oil - 0.3% by weight.
- ASTM Grade 2 fuel oil - 0.5% by weight.

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Reporting and Recordkeeping Requirements

3.7 Fuel Oil Sulfur Content Monitoring and Recordkeeping

The permittee shall demonstrate compliance with Permit Condition 3.6 by obtaining documentation of the sulfur content analysis for each shipment of fuel oil on an as-received basis. Records of this information shall be kept on site for the most recent two-year period and shall be made available to DEQ representatives upon request.

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Location:	Heyburn, Idaho			

4. ROOF MOUNTED HEATERS – NATURAL GAS FIRED

4.1 Process Description

Three roof-mounted heaters provide space heat to the interior of the cheese production facility. The roof-mounted heaters have a combined heat input capacity of less than 10 MMBtu/hr, and all are fueled with natural gas exclusively. Each heater exhausts emissions through two roof-mounted stacks.

4.2 Emissions Control Description

Emissions from the roof mounted heaters are uncontrolled.

Emissions Limits

4.3 Emissions Limits

The PM₁₀ emissions from each heater stack shall not exceed any corresponding emissions rate limits listed in Table 4.1.

Table 4.1 HEATERS EMISSIONS LIMITS

Source Description		PM ₁₀
		lb/day
Heater 1	Stack EF1	0.15
	Stack EF2	0.15
Heater 2	Stack EF3	0.22
	Stack EF4	0.22
Heater 3	Stack EF5	0.11
	Stack EF6	0.11

4.4 Opacity Limit

Emissions from the each heater stack, or any other stack, vent, or functionally equivalent opening associated with the heaters, 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

4.5 Allowable Fuel

The roof-mounted heaters shall be fueled by natural gas exclusively.

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5. SUMMARY OF EMISSION LIMITS

GOSSNER FOODS, INC. MAGIC VALLEY DIVISION – HEYBURN

Table 5.1 EMISSION LIMITS – DAILY (lb/day)

Source Description		PM ₁₀
		lb/day
Natural Gas-fired Boiler 1		4.01
Natural Gas fired Boiler 2		4.01
Diesel Emergency Generator		6.46
Roof Mounted Heater 1	Stack EF1	0.15
	Stack EF2	0.15
Roof Mounted Heater 2	Stack EF3	0.22
	Stack EF4	0.22
Roof Mounted Heater 3	Stack EF5	0.11
	Stack EF6	0.11

Notes: Compliance determined by a pollutant-specific U.S. EPA reference method, DEQ-approved alternative, or as determined by DEQ's emissions estimation methods

PM₁₀ limits include condensibles.

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6. PERMIT TO CONSTRUCT GENERAL PROVISIONS

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the Rules for the Control of Air Pollution in Idaho. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.
2. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.
3. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
 - To enter, at reasonable times, upon the premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
 - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack compliance testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.
4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
5. The permittee shall notify DEQ, in writing, of the required information for the following events within 5 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 performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

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

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

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

8. In accordance with IDAPA 58.01.01.123, all documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.