



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

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

Dirk Kempthorne, Governor  
C. Stephen Allred, Director

December 10, 2001

**CERTIFIED MAIL # 7000 1530 0005 5348 2997**

Mr. Henry Hamanishi, Manager  
Environmental Engineering  
J.R. Simplot Co. – Food Group  
P.O. Box 1059  
Caldwell, Idaho 83605

RE: P-000060, J.R. Simplot Co. - Food Group, Caldwell, Idaho  
Amended PTC No. 027-00009

Dear Mr. Hamanishi:

The Idaho Department of Environmental Quality (Department) is issuing amended Permit to Construct (PTC) No. 027-00009 for J.R. Simplot Co. - Food Group, Caldwell in accordance with IDAPA 58.01.01.200 through 223 (*Rules for the Control of Air Pollution in Idaho*). This PTC is effective immediately and is based on your permit application received on April 22, 2000. This permit does not release the permittee from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Tom Krinke of the Boise Regional Office will contact you regarding a meeting with the Department to discuss the permit terms and requirements. The Department strongly recommends your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions attend the meeting.

You, as well as any other entity, may have the right to appeal this final agency action pursuant to IDAPA 58.01.23 (*Rules of Administrative Procedure Before the Board of Environmental Quality*). A petition may be filed with the Hearings Coordinator, Department of Environmental Quality, 1410 N. Hilton, Boise, ID 83706-1255, within 35 days of the date of this decision. However, the Department encourages you to contact us to address any concerns you may have with the enclosed permit prior to filing a petition for a contested case.

If you have any questions, please call Dan Salgado at 373-0502.

Sincerely,

*Marjorie Mary Emerson*  
FOR

Katherine B. Kelly  
Administrator  
Air Quality Division

RB/KK/tk G:\AHW\BALDWIN\PROGOFF\PTC\SIMPLOT\P-000060 PERMIT LETTER.DOC

Enclosures

cc: Matt Stoll, Boise Regional Office  
Belinda McFarland, Technical Services  
Laurie Kral, EPA - Region 10



**Air Quality  
PERMIT TO CONSTRUCT**

State of Idaho  
Department of Environmental Quality

PERMIT NO.: 027-00009

AQCR: 64

CLASS: A

SIC: 2099

ZONE: 11

UTM COORDINATE (km): 521. 5, 4835 . 0

**1. PERMITTEE**

J. R. Simplot Co., Food Group, Caldwell Plant

**2. PROJECT**

ADI – BVF Anaerobic Digester with Biogas Flare

**3. MAILING ADDRESS**

P. O. Box 1059

**CITY**

Caldwell

**STATE**

Idaho

**ZIP**

83605

**4. FACILITY CONTACT**

Henry Hamanishi, P.E.

**TITLE**

Manager of Environmental Engineering

**TELEPHONE**

(208) 454-4548

**5. RESPONSIBLE OFFICIAL**

Reggie Pederson

**TITLE**

Unit Director

**TELEPHONE**

**6. EXACT PLANT LOCATION**

2 miles west of Caldwell on Hwy 19

**COUNTY**

Canyon

**7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**

Potato and other Food Processing

**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 that are regulated by the state of Idaho and to the sources specifically allowed to be constructed by this permit.

This permit (1) does not affect the title of the premises upon which the equipment is to be located; (2) 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; (3) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; and (4) in no manner implies or suggests that the Idaho Department of Environmental Quality (Department) or its officers, agents, or employees, assumes 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 Department approval pursuant to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.200, et seq.

*Katherine B. Kelly* for

KATHERINE B. KELLY, ADMINISTRATOR, AIR QUALITY DIVISION  
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: December 10, 2001

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: 027-00009**

Permittee: J.R. Simplot Co., Food Group  
Location: Caldwell, Idaho

Date Issued: December 10, 2001

**ADI – BVF ANAEROBIC DIGESTER FLARE**

1. EMISSION LIMITS

1.1 Emissions Limits

Particulate matter (PM), particulate matter with an aerodynamic diameter less than or equal to a nominal ten micrometers (PM<sub>10</sub>), sulfur dioxide (SO<sub>2</sub>), oxides of nitrogen (NO<sub>x</sub>), carbon monoxide (CO), and volatile organic compound (VOC) emissions from the ADI – BVF digester flare stack shall not exceed any corresponding emission rate limits listed in Appendix A of this permit.

1.2 Opacity Limit

Emissions from the ADI – BVF digester flare stack, or any other stack, vent, or functionally equivalent opening associated with the ADI – BVF digester, 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 (*Rules for the Control of Air Pollution in Idaho*). Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

1.3 Visible Emission Limits

Visible emissions shall not be observed leaving the property boundary for a period or periods aggregating more than three minutes in any 60-minute period. Visible emissions shall be determined by EPA Reference Method 22, as described in 40 CFR 60, Appendix A, or Department-approved alternative method.

2. OPERATING REQUIREMENTS

2.1 Hydrogen Sulfide Limits in Biogas

Hydrogen sulfide (H<sub>2</sub>S) concentration in the biogas shall not exceed a maximum of five thousand three hundred ninety-one (5391) parts per million (ppm) by volume

2.2 COD Reduction Limit

The chemical oxygen demand (COD) reduction of the wastewater in the ADI - BVF digester shall be limited to an average of 2.0 million pounds per month during any 12-month period.

2.3 Pilot Flame Requirement

The ADI – BVF digester flare shall be operated with a pilot flame present at all times during the operation of the digester.

2.4 Reasonable Control of Fugitive Emissions

All reasonable precautions shall be taken to prevent particulate matter from becoming airborne as required in IDAPA 58.01.01.651. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of particulate matter. Some of the reasonable precautions include, but are not limited to, the following:

2.4.1 Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands;

2.4.2 Application, where practical, of asphalt, oil, water or suitable chemicals to, or covering of dirt roads, material stockpiles, and other surfaces which can create dust;

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: 027-00009**

**Permittee:** J.R. Simplot Co., Food Group  
**Location:** Caldwell, Idaho

**Date Issued:** December 10, 2001

---

**ADI – BVF ANAEROBIC DIGESTER FLARE**

---

- 2.4.3 Installation and use, where practical, of hoods, fans and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations;
- 2.4.4 Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts;
- 2.4.5 Paving of roadways and their maintenance in a clean condition, where practical; or
- 2.4.6 Prompt removal of earth or other stored material from streets, where practical.
3. MONITORING AND RECORDKEEPING REQUIREMENTS
- 3.1 COD Reduction Monitoring
- The COD reduced in the ADI – BVF digester shall be monitored and recorded, at a minimum, on a monthly basis. Monthly values shall be used to calculate the 12-month averages. A compilation of the most recent two years of records shall be kept onsite and shall be made available to Department representatives upon request.
- 3.2 Pilot Flame Monitoring
- Within 120 days of the issuance of this permit, the permittee shall install, calibrate, maintain, and operate in accordance with manufacturer's specifications, a thermocouple or other equivalent device that detects the presence of a flame. When a pilot flame is not present, the following information shall be recorded in a record:
- 3.2.1 The date the pilot flame was not present;
- 3.2.2 The duration of time the pilot flame was not present;
- 3.2.3 The reason the pilot flame was not present.
- A compilation of the most recent two years of records shall be kept onsite and shall be made available to Department representatives upon request.
- 3.3 Visible Emissions Monitoring
- Opacity shall be determined using the procedures contained in IDAPA 58.01.01.625. The permittee shall monitor and record weekly the visible emission observations, complete with conditions at time of observation. The log shall be kept at the facility for the most recent two-year period and shall be made available to Department representatives upon request.
- 3.4 Operations and Maintenance Manual Requirements
- Within 60 days after startup, the permittee shall have developed an Operations and Maintenance (O&M) Manual for the ADI – BVF digester flare that describes the procedures to be followed to comply with General Provision B and the manufacturer's air pollution control device specifications. This manual shall remain onsite at all times and shall be made available to Department representatives upon request.

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: 027-00009**

**Permittee:** J.R. Simplot Co., Food Group  
**Location:** Caldwell, Idaho

**Date Issued:** December 10, 2001

---

**ADI – BVF ANAEROBIC DIGESTER FLARE**

---

4. **REPORTING REQUIREMENTS**

4.1 **Hydrogen Sulfide Performance Test**

With in 120 days of issuance of this permit, the permittee shall conduct a performance test to measure the hydrogen sulfide (H<sub>2</sub>S) concentration in the biogas prior to the biogas flare. This performance test and any subsequent performance tests conducted to demonstrate compliance with Permit Condition 1.2 shall be performed in accordance with IDAPA 58.01.01.157 and General Provision F of this permit.

4.2 **Performance Test Protocol**

The permittee shall submit a test protocol for the performance test required in Permit Condition 4.1 of this permit to the Department for approval at least 30 days prior to the test days.

4.3 **Performance Test Report**

The permittee shall submit a report of the results of the performance test required in Permit Condition 4.1 of this permit, including all required process data, to the Department within 30 days after the date on which the performance test is concluded.

4.4 **Certification of Documents**

All documents submitted to the Department, including but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certifications, 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.

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: 027-00009**

**Permittee:** J.R. Simplot Co., Food Group  
**Location:** Caldwell, Idaho

**Date Issued:** December 10, 2001

---

**APPENDIX**

---

**APPENDIX**

**J. R. SIMPLOT COMPANY, FOOD GROUP**

**Hourly (lb/hr)<sup>a</sup> and Annual<sup>b</sup> (T/yr)<sup>c</sup> Point Source Emissions Limits<sup>d</sup>**

<b>SOURCE DESCRIPTION</b>	<b>SO<sub>2</sub><sup>e</sup> T/yr</b>
Flare	90.0

<sup>a</sup> Pound per hour

<sup>b</sup> As determined by a pollutant-specific U.S. EPA reference method, Department-approved alternative, or as determined by the Department emission estimation methods used in the permit application analysis.

<sup>c</sup> Tons per year

<sup>d</sup> As determined by multiplying the actual or allowable ( if actual is not available) lb/hr emission rate by the allowable hours per year that the process(es) may operate, or by actual annual production rates.

<sup>e</sup> SO<sub>2</sub> – Sulfur Dioxide

Permittee: J.R. Simplot Co., Food Group  
 Location: Caldwell, Idaho

Date Issued: December 10, 2001

**GENERAL PROVISIONS**

**PERMIT TO CONSTRUCT GENERAL PROVISIONS**

- A. 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 emission 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.
- B. 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.
- C. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
  - 1. To enter at reasonable times upon the premises where an emission source is located, or in which any records are required to be kept under the terms and conditions of this permit; and
  - 2. 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 emission testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.
- D. 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.
- E. The permittee shall notify the Department, in writing, of the required information for the following events within five working days after occurrence:
  - 1. Initiation of Construction - Date
  - 2. Completion/Cessation of Construction - Date
  - 3. Actual Production Startup - Date
  - 4. Initial Date of Achieving Maximum Production Rate - Production Rate and Date
- F. If emission testing is specified, the permittee must schedule such testing within 60 days after achieving the maximum production rate, but not later than 180 days after initial startup. 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 Department. Testing procedures and specific time limitations may be modified by the Department by prior negotiation if conditions warrant adjustment. The Department 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 Department upon request.
 

The maximum allowable operating rate shall be limited to 120% of the average operating rate attained during any performance test period, for which a test protocol has been granted prior approval by the Department, unless (1) the test demonstrates noncompliance; (2) a more restrictive operating limit is specified elsewhere in this permit; or (3) at such an operating rate, emissions would exceed any emission limit(s) set forth in this permit.
- G. 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.