



**Air Pollution  
TIER II OPERATING PERMIT**

State of Idaho  
Department of Environmental Quality

PERMIT NO.: 001-00115

AQCR: 64

CLASS: SM

SIC: 2431

ZONE: 11

UTM COORDINATE (km): 548.3, 4828.3

**1. PERMITTEE**

LP Wood Polymers, Inc.

**2. PROJECT**

Tier II Operating Permit - Northern Ada County PM<sub>10</sub> Maintenance Plan

**3. MAILING ADDRESS**

420 West Franklin

**CITY**

Meridian

**STATE**

Idaho

**ZIP**

83642

**4. FACILITY CONTACT**

Camren Richter

**TITLE**

Group Environmental Manager

**TELEPHONE**

(216) 233-0394

**5. RESPONSIBLE OFFICIAL**

Ken Ropski

**TITLE**

Plant Manager

**TELEPHONE**

(208) 888-6798

**6. EXACT PLANT LOCATION**

420 West Franklin

**COUNTY**

Ada

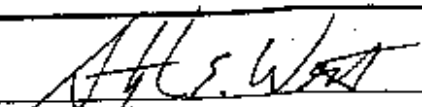
**7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**

Extruded Decking Manufacturing

**8. PERMIT AUTHORITY**

This permit is issued according to the *Rules for the Control of Air Pollution in Idaho*, Section 58.01.01.400 and pertains only to emissions of air contaminants which are regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit.

This permit has been granted on the basis of design information presented in the application and the Idaho Department of Environmental Quality's (Department) technical analysis of the supplied information. Changes in design or equipment, which result in any change in the nature or amount of emissions, may be a modification. Modifications are subject to the Department review in accordance with Section 58.01.01.200 of the *Rules for the Control of Air Pollution in Idaho*.

  
ADMINISTRATOR, BOISE REGIONAL OFFICE  
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: July 12, 2002

DATE EXPIRES: July 12, 2007

REB MASP.TVMB.4005.480

**AIR QUALITY TIER II OPERATING PERMIT NUMBER: 001-00115**

Permittee: LP Wood Polymers, Inc.  
Location: Meridian, Idaho

Date Issued: July 12, 2002  
Date Expires: July 12, 2007

**SOURCE: Storage Silo Baghouse, Baghouses Associated with Conversion Project, Receiver Filters, Cartridge Filters, Grinder Baghouse (BH1), and Associated Vehicle Traffic**

**1. EMISSIONS LIMITS**

**1.1 EMISSIONS LIMITS**

Particulate matter (PM) and particulate matter with an aerodynamic diameter less than or equal to a nominal ten micrometers (PM<sub>10</sub>) emissions from the storage silo baghouse stack, baghouse stacks associated with the conversion project, filter receivers, cartridge filters, and grinder baghouse (BH1), shall not exceed the pounds per hour (lb/hr) and the tons per any consecutive 12-month period (T/yr) limits listed in Appendix.

**1.2 OPACITY LIMITS**

~~Emissions from the storage baghouse stack, baghouse stacks associated with the conversion project, filter receivers, cartridge filters, or any other stack, vent, or functionally equivalent opening, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.04.04.625 (Rules for the Control of Air Pollution in Idaho). Opacity shall be determined by the procedure contained in IDAPA 58.04.04.625.~~

**1.3 VISIBLE EMISSIONS 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 Environmental Protection Agency Reference Method 22 (as described in 40 CFR 60), the Appendix, or a Department-approved alternative method.

**2. OPERATING REQUIREMENTS**

**2.1 OPERATING HOURS**

~~The storage baghouse, baghouses associated with the conversion project, filter receivers, cartridge filters, and BH1 shall be operated according to their respective operation and maintenance (O&M) manual or manufacturer's specifications during operation.~~

**2.2 Baghouse Pressure Drop**

~~The pressure drop across the storage silo baghouse, baghouse associated with the conversion project, filter receivers, cartridge filters, and BH1 shall be maintained within the manufacturer's specifications or the O&M manual. Documentation of the operating pressure drop readings for the baghouses, filter receivers, and filter cartridges shall remain onsite at all times and made available to Department representatives upon request.~~

**2.3 Replacement Bags, Filters, and Cartridges**

~~All bag, filter, and cartridge replacements must be of the same or equivalent performance quality as stated within the facility's application.~~

**AIR QUALITY TIER II OPERATING PERMIT NUMBER: 001- 00115**

Permittee: LP Wood Polymers, Inc.  
Location: Meridian, Idaho

Date Issued: July 12, 2002

~~Date Expires: July 12, 2007~~

**SOURCE: Storage Silo Baghouse, Baghouses Associated with Conversion Project, Receiver Filters, Cartridge Filters, Grinder Baghouse (BH1), and Associated Vehicle Traffic.**

~~2.4 Reasonable Control of Fugitive Emissions~~

~~As required in IDAPA 58.01.01.654, all reasonable precautions shall be taken to prevent PM from becoming airborne. 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 PM.~~

~~Some of the reasonable precautions include, but are not limited to, the following:~~

~~2.4.1 Using water or chemicals for controlling dust when demolishing existing buildings or structures, performing construction operations, grading roads, and clearing of lands;~~

~~2.4.2 Applying asphalt, water or suitable chemicals to, or covering, dirt roads, material stockpiles, and other surfaces that can create dust;~~

~~2.4.3 Installing and using hoods, fans and fabric filters, or equivalent systems to enclose and vent the dusty materials. Adequate containment methods should be employed during sandblasting or other operations;~~

~~2.4.4 Covering open bodied trucks transporting materials likely to give rise to airborne dust;~~

~~2.4.5 Paving of roadways and maintaining them in a clean condition; or~~

~~2.4.6 Promptly removing earth or other stored material from streets.~~

~~3. MONITORING AND RECORDKEEPING REQUIREMENTS~~

~~3.1 Monitor Operation Parameters~~

~~The permittee shall monitor and record on a weekly basis, the pressure drop across each baghouse, receiver filter, and cartridge filter. The most recent two years' compilation of records shall be kept onsite, in a record, and shall be made available to Department representatives upon request.~~

~~3.2 Operations and Maintenance (O&M) Manual Requirements~~

~~Within 90 days after start-up, the permittee shall have developed an O&M manual for each baghouse, receiver filter, and cartridge filter system that describes the procedures 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 be made available to Department representatives upon request.~~

~~4. REPORTING REQUIREMENTS~~

~~4.1 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 TIER II OPERATING PERMIT NUMBER: 001-00115

PERMITTEE: LP WOOD POLYMERS, INC.  
 LOCATION: MERIDIAN, IDAHO

DATE ISSUED: JULY 12, 2002  
~~DATE EXPIRES: JULY 12, 2007~~

## Appendix

### Appendix

LP Wood Polymers, Inc.

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

| SOURCE                                                                                                                           | PM <sub>10</sub> <sup>e</sup> |      |
|----------------------------------------------------------------------------------------------------------------------------------|-------------------------------|------|
|                                                                                                                                  | lb/hr                         | T/yr |
| Storage Silo Baghouse Stack                                                                                                      | 0.014                         | 0.06 |
| Combined emissions of Baghouses, receiver filters, and cartridge filters from Conversion Project with associated vehicle traffic | 0.6                           | 2.62 |
| Grinder Baghouse (BH1)                                                                                                           | 0.09                          | 0.39 |
| Totals                                                                                                                           | 0.704                         | 3.07 |

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

<sup>b</sup> Pound per hour

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

<sup>d</sup> Tons per year

<sup>e</sup> PM<sub>10</sub> - particulate matter with an aerodynamic diameter of 10 microns or less.



# AIR QUALITY TIER II OPERATING PERMIT NUMBER: 001-00115

PERMITTEE: LP WOOD POLYMERS, INC.  
LOCATION: MERIDIAN, IDAHO

DATE ISSUED: JULY 12, 2002  
DATE EXPIRES: JULY 12, 2007

## GENERAL PROVISIONS

### TIER II OPERATING PERMIT GENERAL PROVISIONS

- A. All emissions authorized herein shall be consistent with the terms and conditions of this permit. 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 and operate in good working order all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
- C. The permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
- 1) To enter upon the permittee's 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 to require stack emissions testing (i.e., performance tests) in conformance with state approved or accepted Environmental Protection Agency procedures when deemed appropriate by the Director.
- D. Except for data determined to be confidential under Section 9-342A, *Idaho Code*, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Department of Environmental Quality.
- E. 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.
- F. In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Director.
- G. This permit shall be renewable on the expiration date, provided the permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within sixty (60) days after receipt of the Director's request shall cause the permit to be voided.
- H. The Director may require the permittee to develop a list of operation and maintenance procedures to be approved by the Department. Such list of procedures shall become a part of this permit by reference, and the permittee shall adhere to all of the operation and maintenance procedures contained therein.
- I. Performance tests (i.e., air emission source tests) conducted pursuant to testing requirements in this permit must be conducted in accordance with IDAPA 58.01.01.157. Such testing shall not be conducted on weekends or state holidays unless the permittee obtains prior Department approval.
- The permittee shall submit a proposed test date for each performance test required by this permit to the Department for approval at least 15 days prior to each respective test date (including each test date for periodic tests such as, for example, annual tests). The permittee shall promptly notify the Department of any change in the proposed test date and shall provide at least five working days advance notice prior to conducting any re-scheduled test, unless the Department approves a shorter notice period.

Within 30 days of the date on which a performance test required by this permit is concluded, the permittee shall submit to the Department a performance test report for the respective test. The performance test report shall

AIR QUALITY TIER II OPERATING PERMIT NUMBER: 001-00115

PERMITTEE: LP WOOD POLYMERS, INC.  
LOCATION: MERIDIAN, IDAHO

DATE ISSUED: JULY 12, 2002  
DATE EXPIRES: JULY 12, 2007

GENERAL PROVISIONS

~~include any and all process operating data required to be recorded during the test period as well as the test results, raw test data, and associated documentation.~~

~~The maximum allowable source operating rate shall be limited to 120% of the average operating rate attained during the most recent performance test conducted pursuant to this permit, for which a test protocol has been granted prior approval by the Department, which demonstrated compliance with the respective pollutant emissions limit unless (1) a more restrictive operating limit is specified elsewhere in this permit, or (2) at such an operating rate, emissions would exceed any emissions limit(s) set forth in this permit.~~

J. ~~The provisions of this permit are severable; 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.~~



**Air Pollution  
TIER II OPERATING PERMIT**

State of Idaho  
Department of Environmental Quality

PERMIT NO.: 001-00046

AQCR: 64

CLASS: B

SIC: 3273

ZONE: 11

UTM COORDINATE (km): 554.3, 4823.5

1. **PERMITTEE**  
Consolidated Concrete Company

2. **PROJECT**  
Tier II Operating Permit

|                                            |                      |                       |                     |
|--------------------------------------------|----------------------|-----------------------|---------------------|
| 3. <b>MAILING ADDRESS</b><br>P.O. Box 9225 | <b>CITY</b><br>Boise | <b>STATE</b><br>Idaho | <b>ZIP</b><br>83707 |
|--------------------------------------------|----------------------|-----------------------|---------------------|

|                                            |                         |                                    |
|--------------------------------------------|-------------------------|------------------------------------|
| 4. <b>FACILITY CONTACT</b><br>Bonnie Short | <b>TITLE</b><br>Manager | <b>TELEPHONE</b><br>(208) 939-0303 |
|--------------------------------------------|-------------------------|------------------------------------|

|                                                |                         |                                    |
|------------------------------------------------|-------------------------|------------------------------------|
| 5. <b>RESPONSIBLE OFFICIAL</b><br>Bonnie Short | <b>TITLE</b><br>Manager | <b>TELEPHONE</b><br>(208) 939-0303 |
|------------------------------------------------|-------------------------|------------------------------------|

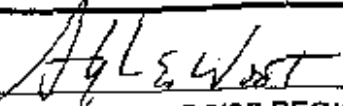
|                                                        |                      |
|--------------------------------------------------------|----------------------|
| 6. <b>EXACT PLANT LOCATION</b><br>11532 W. Joplin Road | <b>COUNTY</b><br>Ada |
|--------------------------------------------------------|----------------------|

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

8. **PERMIT AUTHORITY**

This permit is issued according to the *Rules for the Control of Air Pollution in Idaho*, Section 58.01.01.400 and pertains only to emissions of air contaminants which are regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit.

This permit has been granted on the basis of design information presented in the application and the Idaho Department of Environmental Quality's (Department) technical analysis of the supplied information. Changes in design or equipment that results in any change in the nature or amount of emissions, may be a modification. Modifications are subject to the Department review in accordance with section 58.01.01.200 of the *Rules for the Control of Air Pollution in Idaho*.

  
ADMINISTRATOR, BOISE REGIONAL OFFICE  
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: December 3, 2001

DATE EXPIRES: ~~December 3, 2006~~

Permittee: Consolidated Concrete Company  
Location: Boise, Idaho

Date Issued: December 3, 2001  
~~Date Expires: December 3, 2009~~

**SOURCE: Sand & Gravel Transfer, Weigh Hopper, Truck Mixing, Vehicle Traffic and Associated Emissions**

**1. EMISSION LIMITS**

**1.1 Emission Limits**

Particulate matter (PM) and particulate matter with an aerodynamic diameter less than or equal to a nominal ten micrometers (PM<sub>10</sub>) emissions from the sand and gravel transfer, weigh hopper, truck mixing, vehicle traffic and wind erosion, shall not exceed the pounds per hour (lb/hr) and the tons per any consecutive twelve (12) month period limits listed in the Appendix.

**~~1.2 Opacity Limit~~**

~~Emissions from the sand and gravel transfer, weigh hopper, truck mixing, vehicle traffic and associated processes at any other stack, vent, or functionally equivalent opening, shall not exceed 30 percent opacity for a period or periods aggregating more than three minutes in any 60 minute period as required by IDAPA 58.04.01.025 (Rules for the Control of Air Pollution in Idaho). Opacity shall be determined by the procedure contained in IDAPA 58.04.01.025.~~

**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), the Appendix, or Department-approved alternative method.

**2. OPERATING REQUIREMENTS**

**~~2.1 Operating Requirements~~**

~~The sand and gravel transfer, weigh hopper, and truck mixing shall be operating within their respective operating and maintenance (O&M) manual or their manufacturer's specifications anytime their related process(es) is/are in operation.~~

**~~2.2 Concrete Baghouse~~**

~~The concrete baghouse and the building covering process operations shall be maintained as stated within the manufacturer's specifications or the O&M manual. Documentation of the maintenance or change of operation of the concrete baghouse and the building covering process operations shall remain on-site at all times and shall be made available to Department representatives upon request.~~

**2.3 Material Throughput**

The permittee shall not exceed the production of 250,000 cubic yards of concrete per any consecutive 12-month period.

**AIR QUALITY TIER II OPERATING PERMIT NUMBER: 001-00046**

Permittee: Consolidated Concrete Company  
Location: Boise, Idaho

Date Issued: December 3, 2001  
→ Date Expires: December 6, 2006

**SOURCE: Sand & Gravel Transfer, Weigh Hopper, Truck Mixing, Vehicle Traffic, and Associated Emissions.**

**2.2 Reasonable Control of Fugitive Emissions**

~~All reasonable precautions shall be taken to prevent PM from becoming airborne as required in DAPA 60.01.01.051. 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 PM. Some of the reasonable precautions include, but are not limited to, the following:~~

~~2.2.1 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;~~

~~2.2.2 Application, where practical, of asphalt, oil, water or suitable chemicals to, or covering of dirt roads, material stockpiles, and other surfaces which can erode dust;~~

~~2.2.3 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;~~

~~2.2.4 Covering, where practical, of open bodied trucks transporting materials likely to give rise to airborne dust;~~

~~2.2.5 Paving of roadways and their maintenance in a clean condition, where practical; or~~

~~2.2.6 Prompt removal of earth or other stored material from streets, where practical.~~

**2.3 MONITORING AND RECORDKEEPING REQUIREMENTS**

**3.1 Monitor Operation Parameters**

The permittee shall monitor and record on a weekly basis, any visible emissions from the concrete baghouse. The most recent two years' compilation of records shall be kept onsite, in a record, and shall be made available to Department representatives upon request.

**3.2 Concrete Production**

The permittee shall maintain a record of the cubic yards of concrete produced per any consecutive 12-month period. Production records shall be updated monthly.

**2.4 Operations and Maintenance Manual Requirements**

~~Within 60 days after permit issuance, the permittee shall have developed an O&M manual for the concrete baghouse and the water usage covering the concrete production operation that describes the procedures 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 TIER II OPERATING PERMIT NUMBER: 001-00046

Permittee: Consolidated Concrete Company  
Location: Boise, Idaho

Date Issued: December 3, 2001  
~~Date Expires: December 3, 2006~~

~~SOURCE: Sand & Gravel Transfer, Weigh Hopper, Truck Mixing, Vehicle Traffic, and Associated Emissions~~

~~REPORTING REQUIREMENTS~~

~~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.~~

PERMITTEE: CONSOLIDATED CONCRETE COMPANY  
 LOCATION: BOISE, IDAHO

DATE ISSUED: DECEMBER 3, 2001  
 DATE REVISED: DECEMBER 3, 2000

Appendix

APPENDIX

Consolidated Concrete Company

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

| SOURCE                         | PM <sub>10</sub> |      |
|--------------------------------|------------------|------|
|                                | lb/hr            | T/yr |
| Concrete Storage Silo Baghouse | 0.7              | 0.1  |
| Associated Process Emissions   | 16               | 20   |

- <sup>a</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>b</sup> Pound per hour
- <sup>c</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>d</sup> Tons per year
- <sup>e</sup> PM<sub>10</sub> - particulate matter with an aerodynamic diameter of 10 microns or less.

Permittee: Consolidated Concrete Company  
Location: Boise, Idaho

Date Issued: December 3, 2001  
Date Expires: December 3, 2006

## GENERAL PROVISIONS

## TIER II OPERATING PERMIT GENERAL PROVISIONS

- A. All emissions authorized herein shall be consistent with the terms and conditions of this permit. 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 and operate in good working order all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
- C. The permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
1. To enter upon the permittee's 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 to require stack emission testing (i.e., performance tests) in conformance with state approved or accepted EPA procedures when deemed appropriate by the Director.
- D. Except for data determined to be confidential under Section 9-342A, *Idaho Code*, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Department.
- E. 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.
- F. In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Director.
- G. This permit shall be renewable on the expiration date, provided the permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within 30 days after receipt of the Director's request shall cause the permit to be voided.
- H. The Director may require the permittee to develop a list of operation and maintenance procedures to be approved by the Department. Such list of procedures shall become a part of this permit by reference, and the permittee shall adhere to all of the operation and maintenance procedures contained therein.
- I. Performance tests (i.e. air emission source tests) conducted pursuant to testing requirements in this permit must be conducted in accordance with IDAPA 58.01.01.157. Such testing shall not be conducted on weekends or state holidays unless the permittee obtains prior Department approval.

The permittee shall submit a proposed test date for each performance test required by this permit to the Department for approval at least 15 days prior to each respective test date (including each test date for periodic tests such as, for example, annual tests). The permittee shall promptly notify the Department of any change in the proposed test date and shall provide at least 5 working days advanced notice prior to conducting any rescheduled test, unless the Department approves a shorter notice period.

Within 30 days of the date on which a performance test required by this permit is concluded, the permittee shall submit to the Department a performance test report for the respective test. The performance test report shall



AIR QUALITY TIER II OPERATING PERMIT NUMBER: 001-00046

Permittee: Consolidated Concrete Company  
Location: Boise, Idaho

Date Issued: December 3, 2001  
~~Date Expires: December 3, 2006~~

GENERAL PROVISIONS

~~Include any and all process operating data required to be recorded during the test period as well as the test results, raw test data, and associated documentation.~~

~~The maximum allowable source operating rate shall be limited to 120 percent of the average operating rate attained during the most recent performance test conducted pursuant to this permit, for which a test protocol has been granted prior approval by the Department, which demonstrated compliance with the respective pollutant emission limit unless (1) a more restrictive operating limit is specified elsewhere in this permit or (2) at such an operating rate, emissions would exceed any emission limit(s) set forth in this permit.~~

- J. ~~The provisions of this permit are severable; 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.~~





**Air Pollution  
TIER II OPERATING PERMIT**

State of Idaho  
Department of Environmental Quality

PERMIT NO.: 027-00020

AQCR: 64

CLASS: SM

SIC: 721

ZONE: 11

UTM COORDINATE (km): 524.107, 4835.085

**1. PERMITTEE**

Crookham Company

**2. PROJECT**

Tier II Operating Permit – Northern Ada County PM<sub>10</sub> Maintenance Plan

**3. MAILING ADDRESS**

P.O. Box 520

**CITY**

Caldwell

**STATE**

Idaho

**ZIP**

83606

**4. FACILITY CONTACT**

Gene Hibbard

**TITLE**

Plant Supervisor

**TELEPHONE**

(208) 459-7451

**5. RESPONSIBLE OFFICIAL**

Gene Hibbard

**TITLE**

Plant Supervisor

**TELEPHONE**

(208) 459-7451

**6. EXACT PLANT LOCATION**

301 West Warehouse, Caldwell

**COUNTY**

Canyon

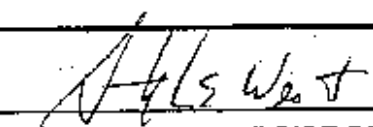
**7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**

Corn, onion seed, and carrot seed processing

**8. PERMIT AUTHORITY**

This permit is issued according to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.400, and pertains only to emissions of air contaminants that are regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit.

This permit has been granted on the basis of design information presented in the application and the Idaho Department of Environmental Quality's (Department) technical analysis of the supplied information. Changes in design or equipment that result in any change in the nature or amount of emissions, may be a modification. Modifications are subject to Department review in accordance with Section 58.01.01.200 of the *Rules for the Control of Air Pollution in Idaho*.

  
ADMINISTRATOR, BOISE REGIONAL OFFICE  
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: January 18, 2002

DATE EXPIRES: January 18, 2007

REB MASP.TVMB.4005.480



AIR QUALITY TIER II OPERATING PERMIT NUMBER: 027- 00020

Permittee: Crookham Company  
Location: Caldwell, Idaho

Date Issued: January 18, 2002  
Date Expires: January 18, 2007

SOURCE: Receiving, Husking, Drying, Shelling, Scalping, Sizing, Electronically Identifying, Bagging, and Vehicle Traffic

**1. ~~EMISSION LIMITS~~**

**1.1 Emission Limits**

Particulate matter (PM), and particulate matter with an aerodynamic diameter less than or equal to a nominal ten micrometers (PM<sub>10</sub>) emissions from the stacks associated with the processes of receiving, husking, drying, shelling, sizing, electronically identifying, and bagging corn, onion, and carrot seeds, as well as vehicle operation shall not exceed the pounds per hour and the tons per any consecutive 12-month period limits listed in the Appendix of this permit.

**1.2 Opacity Limit**

~~Emissions from the stacks associated with the processes of receiving, husking, drying, shelling, sizing, electronically identifying, and bagging of corn, onion and carrot seeds, as well as vehicle, or any other stack, vent, or functionally equivalent opening, shall not exceed 20 percent 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 procedure 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 Environmental Protection Agency Reference Method 22, as described in 40 CFR 60, the Appendix, or a Department-approved alternative method.

**2. ~~OPERATING REQUIREMENTS~~**

**2.1 Operating Hours**

In each process, the receiving, husking, drying, shelling, sizing, electronically identifying, and bagging shall not exceed 1,210 hours of operation per any consecutive 12-month period.

**2.2 Process Requirements**

~~The receiving, husking, drying, shelling, sizing, electronically identifying, bagging processes, and vehicle traffic fugitive dust control shall be maintained as stated within the manufacturer's specifications or associated operation and maintenance manual. Documentation of maintenance or operation changes for any process or traffic fugitive dust operations shall remain on site at all times and made available to Department representatives upon request.~~

**2.3 Material Throughput**

The permittee shall not exceed the receiving limit of 14,000 tons of material for processing per any consecutive 12-month period.

Permittee: Crookham Company  
Location: Caldwell, Idaho

Date Issued: January 18, 2002  
Date Expires: January 18, 2007

SOURCE: Receiving, Husking, Drying, Shelling, Scalping, Sizing, Electronically Identifying, Bagging, and Vehicle Traffic.

#### 2.4 Reasonable Control of Fugitive Emissions

~~As required in IDAPA 58.04.01.654, all reasonable precautions shall be taken to prevent PM from becoming airborne. 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 PM.~~

~~Some of the reasonable precautions include, but are not limited to, the following:~~

- ~~2.4.1 Using water or chemicals for controlling dust when demolishing existing buildings or structures, performing construction operations, grading roads, and clearing of lands;~~
- ~~2.4.2 Applying asphalt, water or suitable chemicals to, or covering, dirt roads, material stockpiles, and other surfaces that can create dust;~~
- ~~2.4.3 Installing and using hoods, fans and fabric filters, or equivalent systems to enclose and vent the dusty materials. Adequate containment methods should be employed during sandblasting or other operations;~~
- ~~2.4.4 Covering open bodied trucks transporting materials likely to give rise to airborne dusts;~~
- ~~2.4.5 Paving of roadways and maintaining them in a clean condition; or~~
- ~~2.4.6 Promptly removing earth or other stored material from streets.~~

#### 3. MONITORING AND RECORDKEEPING REQUIREMENTS

##### 3.1 Monitor Operation Parameters

The most recent five-year compilation of records shall be kept onsite, in a record, and shall be made available to Department representatives upon request. The permittee shall monitor and record, on a weekly basis, the information listed below.

- 3.1.1 Any visible emissions from any stack associated with a process on a weekly basis
- 3.1.2 Hours of operation each year

##### 3.2 Material Received

The permittee shall maintain a record of the material received for processing during any consecutive 12-month period.

##### 3.3 Operations and Maintenance (O&M) Manual Requirements

~~Within 60 days after permit issuance, the permittee shall have developed an O&M manual for each process air pollution control device (cyclone and baghouse). The O&M manual shall describe the procedures followed to comply with General Provision B of this permit and the manufacturer's air pollution control device specifications. This manual shall remain onsite at all times and be made available to Department representatives upon request.~~

AIR QUALITY TIER II OPERATING PERMIT NUMBER: 027-00020

Applicant: Crookham Company  
Location: Caldwell, Idaho

Date Issued: January 18, 2002  
~~Date Expired: January 18, 2007~~

SOURCE: Receiving, Husking, Drying, Shelling, Scalping, Sizing, Electronically Identifying, Bagging, and Vehicle Traffic

~~4. REPORTING REQUIREMENTS~~

~~4.1 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 TIER II OPERATING PERMIT NUMBER: 027-00020**

**Permittee:** Crookham Company  
**Location:** Caldwell, Idaho

**Date Issued:** January 18, 2002  
**Date Expires:** January 18, 2007

**Appendix**

**Appendix**

**Crookham Company**

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

| SOURCE                                                      | PM <sub>10</sub> <sup>e</sup> |      |
|-------------------------------------------------------------|-------------------------------|------|
|                                                             | lb/hr                         | T/yr |
| Combined Cyclones and Baghouses                             | 0.43                          | 0.26 |
| Associated Uncontrolled Stack and Vehicle Traffic Emissions | 9.79                          | 5.92 |

<sup>a</sup> Pound per hour

<sup>b</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>c</sup> Tons per year

<sup>d</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>e</sup> PM<sub>10</sub> - particulate matter with an aerodynamic diameter of 10 microns or less.



Permittee: Crookham Company  
Location: Caldwell, Idaho

Date Issued: January 18, 2002  
Date Expires: January 18, 2007

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**GENERAL PROVISIONS**

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**TIER II OPERATING PERMIT GENERAL PROVISIONS**

- A. All emissions authorized herein shall be consistent with the terms and conditions of this permit. 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, 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 and operate in good working order all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
- C. The permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
1. To enter upon the permittee's 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 to require stack emission testing (i.e., performance tests) in conformance with state-approved or accepted Environmental Protection Agency procedures when deemed appropriate by the Director.
- D. Except for data determined to be confidential under Section 9-342A, *Idaho Code*, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Department.
- E. 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.
- F. In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Director.
- G. This permit shall be renewable on the expiration date, provided the permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within 60 days after receipt of the Director's request shall cause the permit to be voided.
- H. The Director may require the permittee to develop a list of O&M procedures to be approved by the Department. Such list of procedures shall become a part of this permit by reference, and the permittee shall adhere to all of the operation and maintenance procedures contained therein.
- I. Performance tests (i.e., air emission source tests) conducted pursuant to testing requirements in this permit must be conducted in accordance with IDAPA 58.01.01.157. Such testing shall not be conducted on weekends or state holidays unless the permittee obtains prior Department approval.

The permittee shall submit a proposed test date for each performance test required by this permit to the Department for approval at least 15 days prior to each respective test date (including each test date for periodic tests such as, for example, annual tests). The permittee shall promptly notify the Department of any change in the proposed test date and shall provide at least five working days advanced notice prior to conducting any re-scheduled test, unless the Department approves a shorter notice period.

AIR QUALITY TIER II OPERATING PERMIT NUMBER: 027-00020

Permittee: Crookham Company  
Location: Caldwell, Idaho

Date Issued: January 18, 2002  
Date Expires: ~~January 18, 2007~~

**GENERAL PROVISIONS**

~~Within 30 days of the date on which a performance test required by this permit is concluded, the permittee shall submit to the Department a performance test report for the respective test. The performance test report shall include any and all process operating data required to be recorded during the test period as well as the test results, raw test data, and associated documentation.~~

~~The maximum allowable source operating rate shall be limited to 120 percent of the average operating rate attained during the most recent performance test conducted pursuant to this permit, for which a test protocol has been granted prior approval by the Department, which demonstrated compliance with the respective pollutant emission limit unless (1) a more restrictive operating limit is specified elsewhere in this permit, or (2) at such an operating rate, emissions would exceed any emission limit(s) set forth in this permit.~~

J. ~~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.~~



**Air Pollution  
TIER II OPERATING PERMIT**

State of Idaho  
Department of Environmental Quality

PERMIT NO.: 001-00168

AQCR: 64

CLASS: SM

SIC: 5153

ZONE: 11

UTM COORDINATE (km): 548.3, 4828.3

**1. PERMITTEE**

Double D Service Center

**2. PROJECT**

Tier II Operating Permit - Northern Ada County PM<sub>10</sub> Maintenance Plan

**3. MAILING ADDRESS**

502 East 1<sup>st</sup> Street

**CITY**

Meridian

**STATE**

Idaho

**ZIP**

83642

**4. FACILITY CONTACT**

Dick Davis

**TITLE**

President

**TELEPHONE**

(208) 888-3003

**5. RESPONSIBLE OFFICIAL**

Dick Davis

**TITLE**

President

**TELEPHONE**

(208) 888-3003

**6. EXACT PLANT LOCATION**

502 East 1<sup>st</sup> Street

**COUNTY**

Ada

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

Cleaning and bagging Oats and Bird Seed

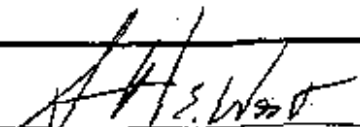
**8. PERMIT AUTHORITY**

This permit is issued according to the *Rules for the Control of Air Pollution in Idaho* (Rules), IDAPA 58.01.01.400 and pertains only to emissions of air contaminants, which are regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit.

This permit has been granted on the basis of design information presented in the application and the Idaho Department of Environmental Quality's (Department) technical analysis of the supplied information. Changes in design or equipment that result in any change in the nature or amount of emissions may be a modification. Modifications are subject to Department review in accordance with Section 58.01.01.200 of the *Rules for the Control of Air Pollution in Idaho*.

DATE ISSUED: February 4, 2002

DATE EXPIRES: February 4, 2007

  
ADMINISTRATOR, BOISE REGIONAL OFFICE  
DEPARTMENT OF ENVIRONMENTAL QUALITY

**SOURCE: Receiving, Cleaning, Grinding, Processing, Transferring and Loading Operations**

**1. EMISSION LIMITS**

**1.1 Emission Limits**

Particulate matter (PM) and particulate matter with an aerodynamic diameter less than or equal to a nominal ten micrometers (PM<sub>10</sub>) emissions from the receiving, cleaning, grinding, processing, transferring, and loading operations, shall not exceed the pounds per hour and the tons per any consecutive 12-month period limits listed in the appendix of this permit.

**1.2 Opacity Limit**

~~Emissions from the receiving, cleaning, grinding, processing, transferring, and loading operations, or any other stack, vent, or functionally equivalent opening, shall not exceed 20 percent opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.025 (Rules for the Control of Air Pollution in Idaho). Opacity shall be determined by the procedure contained in IDAPA 58.01.01.025.~~

**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), the appendix or a Department-approved alternative method.

**2. OPERATING REQUIREMENTS**

**2.1 Operating Hours**

~~The receiving, cleaning, grinding, processing, transferring, and loading operations shall be operated according to their respective operating and maintenance (O&M) manual or manufacturer's specifications.~~

**2.2.1 Grinder Cyclone**

~~The grinder cyclone shall be maintained as stated within the manufacturer's specifications and the O&M manual. Documentation of the maintenance or change in operation of the grinder cyclone shall remain on-site at all times and made available to the Department representatives upon request.~~

**2.3 Reasonable Control of Fugitive Emissions**

~~As required in IDAPA 58.01.01.051, all reasonable precautions shall be taken to prevent PM from becoming airborne. 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 PM.~~

~~Some of the reasonable precautions include, but are not limited to, the following:~~

~~2.3.1 Using water or chemicals for controlling dust when demolishing existing buildings or structures, performing construction operations, grading roads, and clearing of lands;~~

~~2.3.2 Applying asphalt, water or suitable chemicals to, or covering, dirt roads, material stockpiles, and other surfaces that can create dust;~~

~~2.3.3 Installing and using hoods, fans and fabric filters, or equivalent systems to enclose and vent the dusty materials. Adequate containment methods should be employed during sandblasting or other operations;~~

Permittee: Double D Service Center.  
Location: Meridian, Idaho

Date issued: February 4, 2002  
Date Expires: February 4, 2007

SOURCE: Receiving, Cleaning, Grinding, Processing, Transferring and Loading Operations

~~2.3.4~~ Covering open-bodied trucks transporting materials likely to give rise to airborne dusts;

~~2.3.5~~ Paving of roadways and maintaining them in a clean condition; or

~~2.3.6~~ Promptly removing earth or other stored material from streets.

### ~~3. MONITORING AND RECORDKEEPING REQUIREMENTS~~

#### 3.1 Monitor Operation Parameters

The permittee shall monitor and record any visible emissions from the grinder cyclone while in operation on a weekly basis. The most recent five years' compilation of records shall be kept onsite, in a record, and shall be made available to Department representatives upon request.

#### ~~3.2~~ Material Throughput

3.2.1 The permittee shall not process more than 1,250 tons of material per any consecutive 12-month period.

3.2.2 The permittee shall not operate the cleaner or grinder in excess of an average hourly rate of 3 tons of material per hour and 5 tons of material per hour respectively.

3.2.3 The permittee shall record the average hourly material rate processed by the grinder and cleaner for each day in operation.

#### ~~3.3~~ Operations and Maintenance Manual Requirements

~~Within 60 days after permit issuance, the permittee shall have developed an Operation and Maintenance (O&M) manual for the grinder cyclone that describes the procedures 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.~~

### ~~4. REPORTING REQUIREMENTS~~

#### ~~4.1~~ 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.~~

Permittee: Double D Service Center  
Location: Meridian, Idaho

Date Issued: February 4, 2002

Date Expires: February 4, 2007

## Appendix

### Appendix

#### Double D Service Center

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

| SOURCE                                                                          | PM <sub>10</sub> <sup>a</sup> |      |
|---------------------------------------------------------------------------------|-------------------------------|------|
|                                                                                 | lb/hr                         | T/yr |
| Receiving, Cleaning, Grinding, Processing, Transferring, and Loading Operations | 0.5                           | 0.5  |

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

<sup>b</sup> Pounds per hour

<sup>c</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>d</sup> Tons per year

<sup>e</sup> Particulate matter with an aerodynamic diameter of 10 microns or less.

Permittee: Double D Service Center  
Location: Meridian, Idaho

Date issued: February 4, 2002

~~Date Expires: February 4, 2007~~

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**GENERAL PROVISIONS**

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**TIER II OPERATING PERMIT GENERAL PROVISIONS**

- A. All emissions authorized herein shall be consistent with the terms and conditions of this permit. 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, 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 and operate in good working order all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
- C. The permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
1. To enter upon the permittee's 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 to require stack emission testing (i.e., performance tests) in conformance with state approved or accepted EPA procedures when deemed appropriate by the Director.
- D. Except for data determined to be confidential under Section 9-342A, *Idaho Code*, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Department.
- E. 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.
- F. In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Director.
- G. This permit shall be renewable on the expiration date, provided the permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within 60 days after receipt of the Director's request shall cause the permit to be voided.
- H. The Director may require the permittee to develop a list of operation and maintenance procedures to be approved by the Department. Such list of procedures shall become a part of this permit by reference, and the permittee shall adhere to all of the operation and maintenance procedures contained therein.
- I. Performance tests (i.e., air emission source tests) conducted pursuant to testing requirements in this permit must be conducted in accordance with IDAPA 58.01.01.157. Such testing shall not be conducted on weekends or state holidays unless the permittee obtains prior Department approval.

The permittee shall submit a proposed test date for **each** performance test required by this permit to the Department for approval at least 15 days prior to each respective test date (including each test date for periodic tests such as, for example, annual tests). The permittee shall promptly notify the Department of any change in the proposed test date and shall provide at least five working days advanced notice prior to conducting any re-scheduled test, unless the Department approves a shorter notice period.

Within 30 days of the date on which a performance test required by this permit is concluded, the permittee shall submit to the Department a performance test report for the respective test. The performance test report shall

Permittee: Double D Service Center  
Location: Meridian, Idaho

Date Issued: February 4, 2002  
Date Expires: February 4, 2007

### GENERAL PROVISIONS

include any and all process operating data required to be recorded during the test period as well as the test results, raw test data, and associated documentation.

The maximum allowable source operating rate shall be limited to 120 percent of the average operating rate attained during the most recent performance test conducted pursuant to this permit, for which a test protocol has been granted prior approval by the Department, which demonstrated compliance with the respective pollutant emission limit unless (1) a more restrictive operating limit is specified elsewhere in this permit or, (2) at such an operating rate, emissions would exceed any emission limit(s) set forth in this permit.

- J. The provisions of this permit are severable; 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.





**Air Pollution  
TIER II OPERATING PERMIT**

State of Idaho  
Department of Environmental Quality

PERMIT NO.: 001-00091

AQCR: 64

CLASS: SM

SIC: 2499

ZONE: 11

UTM COORDINATE (km): 548.67, 4828.22

**1. PERMITTEE**

Plum Creek Northwest Lumber, Inc.

**2. PROJECT**

Tier II Operating Permit - Northern Ada County PM<sub>10</sub> Maintenance Plan

**3. MAILING ADDRESS**

P.O. Box 674

**CITY**

Meridian

**STATE**

Idaho

**ZIP**

83642

**4. FACILITY CONTACT**

Mitchell Leu

**TITLE**

Environmental Engineer

**TELEPHONE**

(208) 288-3210

**5. RESPONSIBLE OFFICIAL**

Michael J. Covey *Bill Arrow*

**TITLE**

Senior Vice President *Bill Arrow*

**TELEPHONE**

(208) 288-3210

**6. EXACT PLANT LOCATION**

240 Taylor, Meridian

**COUNTY**

Ada

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

Wood Products

**8. PERMIT AUTHORITY**

This permit is issued according to the *Rules for the Control of Air Pollution in Idaho*, Section 58.01.01.400 and pertains only to emissions of air contaminants which are regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit.

This permit has been granted on the basis of design information presented in the application and the Idaho Department of Environmental Quality's (Department) technical analysis of the supplied information. Changes in design or equipment, which result in any change in the nature or amount of emissions, may be a modification. Modifications are subject to the Department review in accordance with Section 58.01.01.200 of the *Rules For the Control Of Air Pollution In Idaho*.

ADMINISTRATOR, BOISE REGIONAL OFFICE  
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: July 12, 2002

~~DATE EXPIRES: July 12, 2007~~

REB MASP.TVMB.4005.480

# AIR QUALITY TIER II OPERATING PERMIT NUMBER: 001-00091

PERMITTEE: PLUM CREEK NORTHWESTERN LUMBER, INC.  
 LOCATION: MERIDIAN, IDAHO

DATE ISSUED: JULY 12, 2002  
~~DATE EXPIRES: JULY 12, 2007~~

## Cyclones, Bins, and Vehicle Traffic

### ~~4. EMISSION LIMITS~~

#### 1.1 Emission Limits

Particulate matter (PM) and particulate matter with an aerodynamic diameter of 10 microns or less (PM<sub>10</sub>) emissions from the cyclones, storage bins, and vehicle traffic shall not exceed the pounds per hour and the tons per any consecutive twelve month period limits listed in the Appendix of this permit.

#### ~~1.2 Opacity Limits~~

~~Emissions from the cyclones, or any other stack, vent, or functionally equivalent opening, shall not exceed 20 percent 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 procedure 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.

### ~~7. OPERATING REQUIREMENTS~~

#### ~~2.1 Operating Hours~~

~~2.1.1 The cyclones and storage bins shall be operating within their respective operating and maintenance (O&M) manual and their manufacturer's specifications any time their related process(es) is/are in operation.~~

2.1.2 The permittee shall not operate each cyclone more than 20 hours per any 24-hour period.

#### ~~2.2 Reasonable Control of Fugitive Emissions~~

~~All reasonable precautions shall be taken to prevent PM 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 PM. Some of the reasonable precautions include, but are not limited to, the following:~~

~~2.2.1 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;~~

~~2.2.2 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;~~

~~2.2.3 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;~~

**AIR QUALITY TIER II OPERATING PERMIT NUMBER: 001-00091**

PERMITTEE: PLUM CREEK NORTHWESTERN LUMBER, INC.  
LOCATION: MERIDIAN, IDAHO

DATE ISSUED: JULY 12, 2002  
DATE EXPIRES: JULY 12, 2007

**Cyclones, Bins, and Vehicle Traffic**

- ~~2.2.4~~ Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts;
- ~~2.2.5~~ Paving of roadways and their maintenance in a clean condition, where practical; or
- ~~2.2.6~~ Prompt removal of earth or other stored material from streets, where practical.

~~2~~ **MONITORING AND RECORDKEEPING REQUIREMENTS**

**3.1 Monitor Operation Parameters**

The permittee shall monitor and record the operational hours of each cyclone at the facility for each 24-hour period on a daily basis. The most recent five years' compilation of records shall be kept onsite, in a record, and shall be made available to Department representatives upon request.

~~2.2~~ **Operations and Maintenance Manual Requirements**

~~Within 60 days after startup, the permittee shall have developed an operations and maintenance (O&M) manual for each cyclone and storage bin that describes the procedures followed to comply with General Provision B of this permit 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.~~

~~4~~ **REPORTING REQUIREMENTS**

~~4.1~~ **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 TIER II OPERATING PERMIT NUMBER: 001-00091

PERMITTEE: PLUM CREEK NORTHWESTERN LUMBER, INC.  
 LOCATION: MERIDIAN, IDAHO

DATE ISSUED: JULY 12, 2002  
~~DATE EXPIRES: JULY 12, 2007~~

## Appendix

## Appendix

### Plum Creek Northwest Lumber, Inc.

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

| SOURCE          | PM <sub>10</sub> <sup>e</sup> |      |
|-----------------|-------------------------------|------|
|                 | lb/hr                         | T/yr |
| Cyclones        | 7.6                           | 10.8 |
| Storage Bins    |                               | 1.0  |
| Vehicle Traffic |                               | 1.2  |
| Facility Totals | 8.74                          | 13.0 |

<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 emissions rate by the allowable hours per year that the process(es) may operate, or by actual annual production rates.

<sup>e</sup> PM<sub>10</sub> - particulate matter with an aerodynamic diameter of 10 microns or less.

AIR QUALITY TIER II OPERATING PERMIT NUMBER: 001-00091

PERMITTEE: PLUM CREEK NORTHWEST LUMBER, INC  
LOCATION: MERIDIAN, IDAHO

DATE ISSUED: JULY 12, 2002  
DATE EXPIRES: JULY 12, 2007

GENERAL PROVISIONS

TIER II OPERATING PERMIT GENERAL PROVISIONS

- A. All emissions authorized herein shall be consistent with the terms and conditions of this permit. 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, 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 and operate in good working order all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
- C. The permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
1. To enter upon the permittee's 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; 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 to require stack emissions testing (i.e., performance tests) in conformance with state-approved or accepted EPA procedures when deemed appropriate by the Director.
- D. Except for data determined to be confidential under Section 9-342A, *Idaho Code*, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Department of Environmental Quality.
- E. 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.
- F. In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Director.
- G. This permit shall be renewable on the expiration date, provided the permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within sixty (60) days after receipt of the Director's request shall cause the permit to be voided.
- H. The Director may require the permittee to develop a list of Operation and Maintenance Procedures to be approved by the Department. Such list of procedures shall become a part of this permit by reference, and the permittee shall adhere to all of the operation and maintenance procedures contained therein.
- I. Performance tests (i.e., air emissions source tests) conducted pursuant to testing requirements in this permit must be conducted in accordance with IDAPA 58.01.01.157. Such testing shall not be conducted on weekends or state holidays unless the permittee obtains prior Department approval.

The permittee shall submit a proposed test date for each performance test required by this permit to the Department for approval at least fifteen (15) days prior to each respective test date (including each test date for periodic tests such as, for example, annual tests). The permittee shall promptly notify the Department of any change in the proposed test date and shall provide at least five (5) working days advance notice prior to conducting any re-scheduled test, unless the Department approves a shorter notice period.

Within thirty (30) days of the date on which a performance test required by this permit is concluded, the permittee shall submit to the Department a performance test report for the respective test. The performance test report

AIR QUALITY TIER II OPERATING PERMIT NUMBER: 001-00091

PERMITEE: PLUM CREEK NORTHWEST LUMBER, INC.  
LOCATION: MERIDIAN, IDAHO

DATE ISSUED: JULY 12, 2002  
~~DATE EXPIRES: JULY 12, 2007~~

GENERAL PROVISIONS

~~shall include any and all process operating data required to be recorded during the test period as well as the test results, raw test data, and associated documentation.~~

~~The maximum allowable source operating rate shall be limited to 120% of the average operating rate attained during the most recent performance test conducted pursuant to this permit, for which a test protocol has been granted prior approval by the Department, which demonstrated compliance with the respective pollutant emissions limit unless; (1) a more restrictive operating limit is specified elsewhere in this permit or; (2) at such an operating rate, emissions would exceed any emissions limit(s) set forth in this permit.~~

- J. ~~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.~~



**Air Quality  
TIER II OPERATING PERMIT**

State of Idaho  
Department of Environmental Quality

PERMIT NO.: T2-000033

AIRS FACILITY NO.: 001-00019

AQCR: 64

CLASS: SM

SIC: 1142

ZONE: 11

UTM COORDINATE (km): 544.0, 4826.0

**1. PERMITTEE**

C. Wright Construction, Inc.

**2. PROJECT**

Tier II Operating Permit - Northern Ada County PM<sub>10</sub> Maintenance Plan

**3. MAILING ADDRESS**

1320 South Black Cat Road

**CITY**

Meridian

**STATE**

ID

**ZIP**

83642

**4. FACILITY CONTACT**

Tim Wright

**TITLE**

President

**TELEPHONE**

(208) 888-1307

**5. RESPONSIBLE OFFICIAL**

Tim Wright

**TITLE**

President

**TELEPHONE**

(208) 888-1307

**6. EXACT PLANT LOCATION**

1320 South Black Cat Road

**COUNTY**

Ada

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

Sand, gravel, and crushed stone production and hot-mix asphalt

**8. PERMIT AUTHORITY**

This permit is issued according to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.400, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit.

This permit has been granted on the basis of design information presented in the application and the Idaho Department of Environmental Quality's technical analysis of the supplied information. Changes in design or equipment that result in any change in the nature or amount of emissions may be considered a modification. Modifications are subject to Department review in accordance with Section 58.01.01.200 of the *Rules for the Control of Air Pollution in Idaho*.

Q. STEPHEN ALLRED, DIRECTOR  
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: July 8, 2003

DATE EXPIRES: ~~July 8, 2008~~

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## Acronyms, Units, and Chemical Nomenclature

|                            |                                                                                                                                                 |
|----------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------|
| <del>acfm</del>            | <del>actual cubic foot per minute</del>                                                                                                         |
| <del>AIRS</del>            | <del>Aerometric Information Retrieval System</del>                                                                                              |
| <del>AQCR</del>            | <del>Air Quality Control Region</del>                                                                                                           |
| <del>CO</del>              | <del>carbon dioxide</del>                                                                                                                       |
| <del>CFR</del>             | <del>Code of Federal Regulations</del>                                                                                                          |
| <del>Department</del>      | <del>Department of Environmental Quality</del>                                                                                                  |
| <del>dscf</del>            | <del>dry standard cubic foot</del>                                                                                                              |
| <del>EPA</del>             | <del>U.S. Environmental Protection Agency</del>                                                                                                 |
| <del>°F</del>              | <del>degrees Fahrenheit</del>                                                                                                                   |
| <del>ft</del>              | <del>foot</del>                                                                                                                                 |
| <del>gr</del>              | <del>grain (1 lb = 7,000 grains)</del>                                                                                                          |
| <del>gr/dscf</del>         | <del>grains per dry standard cubic foot</del>                                                                                                   |
| <del>IDAPA</del>           | <del>a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act</del> |
| <del>in</del>              | <del>inches</del>                                                                                                                               |
| <del>km</del>              | <del>kilometers</del>                                                                                                                           |
| <del>lb/hr</del>           | <del>pound per hour</del>                                                                                                                       |
| <del>NO<sub>x</sub></del>  | <del>nitrogen oxides</del>                                                                                                                      |
| <del>NSPS</del>            | <del>New Source Performance Standards</del>                                                                                                     |
| <del>PERF</del>            | <del>Portable Equipment Relocation Form</del>                                                                                                   |
| <del>PM</del>              | <del>particulate matter</del>                                                                                                                   |
| <del>PM<sub>10</sub></del> | <del>particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers</del>                                       |
| <del>SIC</del>             | <del>Standard Industrial Classification</del>                                                                                                   |
| <del>SM</del>              | <del>synthetic minor</del>                                                                                                                      |
| <del>SO<sub>2</sub></del>  | <del>sulfur dioxide</del>                                                                                                                       |
| <del>T/hr</del>            | <del>tons per hour</del>                                                                                                                        |
| <del>T/yr</del>            | <del>tons per year</del>                                                                                                                        |
| <del>UTM</del>             | <del>Universal Transverse Mercator</del>                                                                                                        |
| <del>VOC</del>             | <del>volatile organic compound</del>                                                                                                            |

# AIR QUALITY TIER II OPERATING PERMIT NUMBER: T2-000033

|            |                             |                             |               |              |
|------------|-----------------------------|-----------------------------|---------------|--------------|
| Permittee: | C. Wright Construction, Inc | AIRS Facility No. 001-00019 | Date Issued:  | July 8, 2003 |
| Location:  | Meridian, Idaho             |                             | Date Expires: | July 8, 2008 |

## 1 TIER II OPERATING PERMIT SCOPE

### Purpose

~~1.1 The purpose of this permit is to limit PM<sub>10</sub> emissions from this facility as part of the Northern Ada County PM<sub>10</sub> Maintenance Plan.~~

~~1.2 This permit is the facility's initial air quality permit.~~

### Regulated Sources

~~4.3 Table 1.1 lists all sources regulated in this permit.~~

Table 1.1 SUMMARY OF REGULATED SOURCES

| <u>Permit Section</u> | <u>Source Description</u>                                                                                                                                                                                                                                                                          | <u>Emissions Control</u>                                                                      |
|-----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------|
| <del>4</del>          | <del>Hot-mix Asphalt plant<br/>Manufacturer: Barber Green<br/>Manufacture Date: 1958<br/>Rated capacity: 106 T/hr<br/>Stack diameter: 24 in x 27 in<br/>Stack height: 42 ft<br/>Exhaust stack operating temperature: 155°F<br/>Exhaust gas flow rate: 18,300 acfm<br/>Fuel type: natural gas</del> | <del>Wet Scrubber<br/>Manufacturer: Unknown<br/>Efficiency: Unknown for PM<sub>10</sub></del> |
| <del>4</del>          | <del>Emissions associated with mined and processed river deposits</del>                                                                                                                                                                                                                            | <del>Reasonable water application</del>                                                       |

# AIR QUALITY TIER II OPERATING PERMIT NUMBER: T2-000033

|            |                             |                             |               |              |
|------------|-----------------------------|-----------------------------|---------------|--------------|
| Permittee: | C. Wright Construction, Inc | AIRS Facility No. 001-00019 | Date issued:  | July 8, 2003 |
| Location:  | Meridian, Idaho             |                             | Date Expires: | July 8, 2008 |

## 2. FACILITY-WIDE CONDITIONS

### ~~Fugitive Dust~~

- ~~2.1 All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651. 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:~~
- ~~— 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 land.~~
  - ~~— 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.~~
  - ~~— Installation and use, when practical, 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.~~
  - ~~— Covering, where practical, of open bodied trucks transporting materials likely to give rise to airborne dusts.~~
  - ~~— Paving of roadways and their maintenance in a clean condition, where practical.~~
  - ~~— Prompt removal of earth or other stored material from streets, where practical.~~
- ~~2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.~~
- ~~2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.~~
- ~~2.4 The permittee shall conduct a weekly facility wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each weekly fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.~~
- 2.5 Fugitive emissions shall not be observed leaving the facility boundary for a period or periods aggregating more than three minutes in any 60-minute period. Visible emissions shall be determined by EPA Method 22, as described in 40 CFR 60, Appendix A, or a Department-approved alternative method.

**AIR QUALITY TIER II OPERATING PERMIT NUMBER: T2-000033**

|            |                             |                             |               |              |
|------------|-----------------------------|-----------------------------|---------------|--------------|
| Permittee: | C. Wright Construction, Inc | AIRS Facility No. 001-00019 | Date Issued:  | July 8, 2003 |
| Location:  | Meridian, Idaho             |                             | Date Expires: | July 8, 2008 |

**Odors**

- ~~2.6 In accordance with IDAPA 58.01.01.776, no person shall allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.~~
- ~~2.7 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.~~

**Visible Emissions**

- ~~2.8 The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides and/or chlorine gas is the only reason(s) for the failure of the emission to comply with the requirements of this section.~~
- ~~2.9 The permittee shall conduct a weekly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see evaluation for each potential source. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each weekly visible emissions inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.~~

**Excess Emissions**

- ~~2.10 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.~~

**Open Burning**

- ~~2.11 The permittee shall comply with the requirements of the Rules for Control of Open Burning, IDAPA 58.01.01.688-646.~~

**AIR QUALITY TIER II OPERATING PERMIT NUMBER: T2-000033**

|                   |                             |                                    |                      |              |
|-------------------|-----------------------------|------------------------------------|----------------------|--------------|
| <b>Permittee:</b> | C. Wright Construction, Inc | <b>AIRS Facility No.</b> 001-00019 | <b>Date Issued:</b>  | July 8, 2003 |
| <b>Location:</b>  | Meridian, Idaho             |                                    | <b>Date Expires:</b> | July 8, 2008 |

**Performance Testing**

~~2.12 If testing is required, the permittee shall use the test methods listed in Table 2.2 to measure the pollutant emissions.~~

**Table 2.2 FACILITY-WIDE TEST METHODS**

| Pollutant                 | Test Method                          | Special Conditions                                                                      |
|---------------------------|--------------------------------------|-----------------------------------------------------------------------------------------|
| PM <sub>10</sub>          | EPA Method 201.a, and EPA Method 202 |                                                                                         |
| <del>PM</del>             | <del>EPA Method 5</del>              |                                                                                         |
| <del>NO<sub>x</sub></del> | <del>EPA Method 7</del>              |                                                                                         |
| <del>SO<sub>2</sub></del> | <del>EPA Method 6</del>              |                                                                                         |
| <del>CO</del>             | <del>EPA Method 10</del>             |                                                                                         |
| <del>VOC</del>            | <del>EPA Method 25</del>             |                                                                                         |
| <del>Opacity</del>        | <del>EPA Method 9</del>              | <del>If NEPS, IDAPA 58.01.01.825 and Method 9, otherwise, IDAPA 58.01.01.025 only</del> |

\* Or Department-approved alternative in accordance with IDAPA 58.01.01.157.

**Air Stagnation Advisory Days**

~~2.13 The permittee shall comply with the Air Pollution Emergency Rules in accordance with IDAPA 58.01.01.550-562.~~

**Monitoring and Recordkeeping**

2.14 The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this operating permit. Records of monitoring information 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 Department representatives upon request.

**AIR QUALITY TIER II OPERATING PERMIT NUMBER: T2-000033**

|            |                             |                             |                          |                         |
|------------|-----------------------------|-----------------------------|--------------------------|-------------------------|
| Permittee: | C. Wright Construction, Inc | AIRS Facility No. 001-00019 | Date Issued:             | July 8, 2003            |
| Location:  | Meridian, Idaho             |                             | <del>Date Expires:</del> | <del>July 8, 2006</del> |

**Reports and Certifications**

~~2.15. Any reporting required by this permit, 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. Any reporting required by this permit shall be submitted to the following:~~

~~Air Quality Permit Compliance  
Department of Environmental Quality  
Boise Regional Office  
1445 N. Orchard  
Boise, ID 83706~~

~~At least 10 days prior to relocating any equipment covered by this permit, the permittee shall register all existing portable equipment using the Department's Portable Equipment Registration and Relocation Form (PERF) available on the Department's Website at [www.state.id.us/deq/air/equip reloc.htm](http://www.state.id.us/deq/air/equip reloc.htm). Each PERF, along with a scaled plot plan of the relocation site, shall be mailed to the following address:~~

~~PERF Processing Unit  
Idaho DEQ, Air Quality  
1440 N. Hilton  
Boise, ID 83706-1255~~

**Obligation to Comply**

~~2.16. Receiving a Tier II operating permit shall not relieve any owner or operator of the responsibility to comply with all applicable local, state, and federal rules and regulations.~~

**Fuel-burning Equipment**

~~2.17. The permittee shall not discharge to the atmosphere from any fuel-burning equipment PM in excess of 0.045 g/dscf of effluent gas corrected to 3% oxygen by volume for gas as required by IDAPA 58.04.04.676.~~

**AIR QUALITY TIER II OPERATING PERMIT NUMBER: T2-000033**

|                   |                             |                                    |                      |                         |
|-------------------|-----------------------------|------------------------------------|----------------------|-------------------------|
| <b>Permittee:</b> | C. Wright Construction, Inc | <b>AIRS Facility No. 001-00019</b> | <b>Date Issued:</b>  | July 8, 2003            |
| <b>Location:</b>  | Meridian, Idaho             |                                    | <b>Date Expires:</b> | <del>July 8, 2008</del> |

### 3. HOT - MIX ASPHALT PLANT

#### 3.1 Process Description

~~A hot-mix asphalt plant combines dried aggregates and hot oil to produce asphaltic concrete.~~

#### 3.2 Control Description

~~This hot-mix asphalt plant's emissions are controlled by a wet scrubber.~~

~~Table 3.1 HOT MIX ASPHALT PLANT~~

| <del>Emissions Unit(s) / Process(es)</del> | <del>Emissions Control Device</del> | <del>Emissions Point</del>       |
|--------------------------------------------|-------------------------------------|----------------------------------|
| <del>Hot-mix asphalt plant</del>           | <del>Wet scrubber</del>             | <del>Scrubber stack outlet</del> |

### Emissions Limits

#### 3.3 Emission Limits

PM<sub>10</sub> emissions from the hot-mix asphalt plant's scrubber stack shall not exceed any corresponding emission rate limit listed in Tables 3.2 and 5.1 of this permit.

**Table 3.2 EMISSIONS LIMITS**

| Source Description                     | PM <sub>10</sub> |      |
|----------------------------------------|------------------|------|
|                                        | Lb/hr            | T/yr |
| Hot-mix asphalt plant's scrubber stack | 4.86             | 1.14 |

### Operating Requirements

#### 3.4 Production Rate

The asphalt production shall not exceed 50,000 tons for the most recent consecutive 12-month period.

#### 3.5 Operating Hours

The permittee shall only operate the hot-mix asphalt plant between the hours of 6:00 a.m. to 6:00 p.m.

#### 3.6 Thermometer Installation

The permittee shall install, operate, calibrate, and maintain a device to continuously measure the hot-mix asphalt plant's exhaust stack temperature while processing hot-mix asphalt.

#### 3.7 Exhaust Stack Operating Temperature

The exhaust stack operating temperature shall not exceed 155°F.

**AIR QUALITY TIER II OPERATING PERMIT NUMBER: T2-000033**

|                   |                             |                                    |                      |              |
|-------------------|-----------------------------|------------------------------------|----------------------|--------------|
| <b>Permittee:</b> | C. Wright Construction, Inc | <b>AIRS Facility No.</b> 001-00019 | <b>Date Issued:</b>  | July 8, 2003 |
| <b>Location:</b>  | Meridian, Idaho             |                                    | <b>Date Expires:</b> | July 8, 2008 |

**3.8 Hot-Mix Asphalt Plant Burner Fuel**

The permittee shall combust natural gas exclusively in the hot-mix asphalt plant's burner.

**~~3.9 O & M Manual~~**

~~Within 60 days after issuance of this permit, the permittee shall have developed an O&M manual for the wet scrubber that describes the procedures followed to comply with Tier II General Provision 7.2 of this permit. This manual shall remain onsite at all times and shall be made available to Department representatives upon request.~~

**Monitoring and Recordkeeping Requirements**

**3.10** The permittee shall monitor and record the following information:

- The amount of asphalt produced monthly and annually. Monthly production shall be summed for the previous consecutive 12-month period to demonstrate compliance with Permit Condition 3.4.
- Startup and shutdown of the hot-mix asphalt plant each day the plant operates to demonstrate compliance with Permit Condition 3.5.
- The exhaust stack operating temperature once per hour each day the plant operates to demonstrate compliance with Permit Condition 3.7.

These records shall be maintained in accordance with Permit Condition 2.14.



# AIR QUALITY TIER II OPERATING PERMIT NUMBER: T2-000033

|            |                             |                             |               |              |
|------------|-----------------------------|-----------------------------|---------------|--------------|
| Permittee: | C. Wright Construction, Inc | AIRS Facility No. 001-00019 | Date Issued:  | July 8, 2003 |
| Location:  | Meridian, Idaho             |                             | Date Expires: | July 8, 2008 |

## 4. ASSOCIATED PROCESS EMISSIONS

~~4.1 PM<sub>10</sub> emissions result from mining and/or crushing aggregate. The processes involved in mining and/or crushing activities include, but are not limited to, the following: loading, crushing, screening, transferring, stockpiling, and vehicle traffic on paved and unpaved roads.~~

~~Table 4.4 Associated process emissions~~

| <del>Process</del>                      | <del>Emissions Control Device</del> | <del>Emissions Point</del> |
|-----------------------------------------|-------------------------------------|----------------------------|
| <del>Associated process emissions</del> | <del>Reasonable control</del>       | <del>NA</del>              |

## Emissions Limits

### 4.2 Emission Limits

PM<sub>10</sub> emissions from sand and gravel transfers, crushers, screens, vehicle traffic and associated processes shall not exceed 31 tons per any consecutive 12-month period.

## Operating Requirements

### 4.3 Sand and Gravel Mining

River deposits that are mined shall not exceed 729,000 tons for the most recent consecutive 12-month period.

### 4.4 Processed Material

River deposits that are processed (crushed, screened, transferred, and etc) shall not exceed 461,000 tons for the most recent consecutive 12 month period.

### ~~4.5 NSPS Affected Crusher Opacity Limit~~

~~PM emissions from any NSPS affected crusher shall not exhibit greater than 15% opacity as required by 40 CFR 60, Subpart 600. Opacity shall be determined using the procedures specified in IDAPA 58.01.01.625.~~

### ~~4.6 NSPS Affected Transfer Point on Belt Conveyor or any Other Affected Facility Opacity Limit~~

~~PM emissions from any NSPS affected transfer point on belt conveyors, or from each grinding mill, screening operation, bucket elevator, belt conveyor bagging operation, storage bin, enclosed truck, or rail car loading, shall not exhibit greater than 10% opacity as required by 40 CFR 60, Subpart 600. Opacity shall be determined using procedures specified in IDAPA 58.01.01.625.~~

**AIR QUALITY TIER II OPERATING PERMIT NUMBER: T2-000033**

|            |                             |                             |                          |                         |
|------------|-----------------------------|-----------------------------|--------------------------|-------------------------|
| Permittee: | C. Wright Construction, Inc | AIRS Facility No. 001-00019 | Date Issued:             | July 8, 2003            |
| Location:  | Meridian, Idaho             |                             | <del>Date Expires:</del> | <del>July 8, 2008</del> |

**~~Monitoring and Recordkeeping Requirements~~**

4.7 The permittee shall monitor and record the following information:

- The total amount of river deposits mined monthly and annually. Monthly throughput shall be summed over the previous consecutive 12-month period to demonstrate compliance with Permit Condition 4.3. The total amount of river deposits mined means the amount that is mined for use by the permittee plus the amount that is mined and sold to the general public, contractors, etc.
- The total amount of river deposits processed by the permittee monthly and annually. Monthly throughput shall be summed over the previous consecutive 12-month period to demonstrate compliance with Permit Condition 4.4.

These records shall be maintained in accordance with Permit Condition 2.14.

**AIR QUALITY TIER II OPERATING PERMIT NUMBER: T2-000033**

|                   |                             |                                    |                      |              |
|-------------------|-----------------------------|------------------------------------|----------------------|--------------|
| <b>Permittee:</b> | C. Wright Construction, Inc | <b>AIRS Facility No. 001-00019</b> | <b>Date Issued:</b>  | July 8, 2003 |
| <b>Location:</b>  | Meridian, Idaho             |                                    | <b>Date Expires:</b> | July 8, 2008 |

## 5. SUMMARY OF EMISSION RATE LIMITS

Table 5.1 provides a summary of all emission rate limits required by this permit.

**Table 5.1 SUMMARY OF EMISSION RATE LIMITS**

| <b>C. Wright Construction Meridian<br/>Emission Limits - Hourly (lb/hr) and Annual (t/yr)</b>                                                                                                                                                                                                                                                                                                                                                                              |                                                     |                                                    |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------|----------------------------------------------------|
| <b>Source Description</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <b>Hourly PM<sub>10</sub> Emissions<br/>(lb/hr)</b> | <b>Annual PM<sub>10</sub> Emissions<br/>(t/yr)</b> |
| Asphalt Plant                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 4.84                                                | 1.14                                               |
| All associated process emissions<br>(fugitives included)                                                                                                                                                                                                                                                                                                                                                                                                                   | NA                                                  | 31                                                 |
| <p>* As determined by a pollutant-specific EPA reference method, a Department-approved alternative, or as determined by the Department's emissions estimation methods used in this permit analysis.</p> <p>* As determined by multiplying the actual or allowable (if actual is not available) pound per hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.</p> <p>* Includes condensibles.</p> |                                                     |                                                    |

**AIR QUALITY TIER II OPERATING PERMIT NUMBER: T2-000033**

|                   |                             |                          |           |                      |              |
|-------------------|-----------------------------|--------------------------|-----------|----------------------|--------------|
| <b>Permittee:</b> | C. Wright Construction, Inc | <b>AIRS Facility No.</b> | 001-00019 | <b>Date Issued:</b>  | July 8, 2003 |
| <b>Location:</b>  | Meridian, Idaho             |                          |           | <b>Date Expires:</b> | July 8, 2008 |

**~~6. FACILITY WIDE EMISSIONS INVENTORY~~**

~~Table 6.1 provides a summary of the emissions inventory of the facility based on uncontrolled potential to emit. The emissions inventory table is provided for informational purposes only.~~

~~Table 6.1 SUMMARY OF EMISSIONS INVENTORY~~

| <del>C. Wright Construction, Meridian<br/>Emission Limits - Hourly (lb/hr) and Annual (Tpyr)</del>                                                                                                                                                                                                                                                                                                                                                                                           |                                                         |                                                        |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------|--------------------------------------------------------|
| <del>Source Description</del>                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <del>Hourly PM<sub>10</sub> Emissions<br/>(lb/hr)</del> | <del>Annual PM<sub>10</sub> Emissions<br/>(Tpyr)</del> |
| <del>Asphalt Driveway</del>                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <del>1.81</del>                                         | <del>24.2</del>                                        |
| <del>All associated process emissions<br/>(fugitives included)</del>                                                                                                                                                                                                                                                                                                                                                                                                                         | <del>N/A</del>                                          | <del>158.2</del>                                       |
| <del>* As determined by a pollutant-specific EPA reference method, a Department-approved alternative, or as determined by the Department's emissions estimation methods used in this permit analysis.</del><br><del>* As determined by multiplying the actual or allowable (if actual is not available) pound per hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.</del><br><del>* Includes condensibles.</del> |                                                         |                                                        |

**AIR QUALITY TIER II OPERATING PERMIT NUMBER: T2-000033**

|                   |                             |                                    |                      |              |
|-------------------|-----------------------------|------------------------------------|----------------------|--------------|
| <b>Permittee:</b> | C. Wright Construction, Inc | <b>AIRS Facility No.</b> 001-00019 | <b>Date Issued:</b>  | July 8, 2003 |
| <b>Location:</b>  | Meridian, Idaho             |                                    | <b>Date Expires:</b> | July 8, 2008 |

**TIER II PERMIT GENERAL PROVISIONS**

- 7.1 All emissions authorized herein shall be consistent with the terms and conditions of this permit. 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.
- 7.2 The permittee shall at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintain and operate in good working order all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
- 7.3 The permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
- To enter upon the permittee's 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; and
  - 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 to require stack emissions testing (i.e., performance tests) in conformance with state-approved or accepted EPA procedures when deemed appropriate by the Director.
- 7.4 Except for data determined to be confidential under Section 9-342A *Idaho Code*, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Department of Environmental Quality.
- 7.5 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.
- 7.6 In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter; a copy of which shall be forwarded to the Director.
- 7.7 This permit shall be renewable on the expiration date, provided the permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within 60 days after receipt of the Director's request shall cause the permit to become void.
- 7.8 The Director may require the permittee to develop a list of operation and maintenance procedures to be approved by the Department. Such list of procedures shall become a part of this permit by reference, and the permittee shall adhere to all of the operation and maintenance procedures contained therein.
- 7.9 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.





**Air Quality  
TIER II OPERATING PERMIT  
and  
PERMIT TO CONSTRUCT**

State of Idaho  
Department of Environmental Quality

PERMIT NO.: T2-020029

AIRS FACILITY NO.: 777-00226

CLASS: B

SIC: 1442

UTM COORDINATE (km): PORTABLE

**1. PERMITTEE**

Nelson Construction Co.

**2. PROJECT**

Tier II Operating Permit and Permit to Construct

**3. MAILING ADDRESS**

P.O. Box 16550

**CITY**

Boise

**STATE**

ID

**ZIP**

83715

**4. FACILITY CONTACT**

Bob Potts

**TITLE**

Production Manager

**TELEPHONE**

(208) 343-3051

**5. RESPONSIBLE OFFICIAL**

Bob Potts

**TITLE**

Production Manager

**TELEPHONE**

(208) 343-3051

**6. EXACT PLANT LOCATION**

Portable

**COUNTY**

Ada

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

Aggregate crushing

**8. PERMIT AUTHORITY**

This permit is issued according to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.400-470 and IDAPA 58.01.01.200-228. This permit pertains only to emissions of air contaminants, which are regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit. Only the terms and conditions pertaining to Tier II operating permit requirements are subject to the expiration date of this permit.

This permit is not transferable to another person, place, or piece or set of equipment. This permit will expire if construction has not yet 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 in the application and the Idaho Department of Environmental Quality's technical analysis of the supplied information. Changes in design or equipment that result in any change in the nature or amount of emissions may be considered a modification. Modifications are subject to Department review in accordance with IDAPA 58.01.01.200 et seq.

STEPHEN ALLRED, DIRECTOR  
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: July 21, 2003

DATE EXPIRES: July 21, 2008

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## LIST OF ACRONYMS

|                  |                                                                                                                                      |
|------------------|--------------------------------------------------------------------------------------------------------------------------------------|
| ASTM             | American Society for Testing and Materials                                                                                           |
| CFR              | Code of Federal Regulations                                                                                                          |
| Department       | Department of Environmental Quality                                                                                                  |
| dscf             | dry standard cubic feet                                                                                                              |
| EPA              | U.S. Environmental Protection Agency                                                                                                 |
| gr               | grain (1 lb = 7,000 grains)                                                                                                          |
| IDAPA            | a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act |
| lb/hr            | pound per hour                                                                                                                       |
| NO <sub>x</sub>  | nitrogen oxides                                                                                                                      |
| O&M              | Operations and Maintenance                                                                                                           |
| PM               | particulate matter                                                                                                                   |
| PM <sub>10</sub> | particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers                                       |
| PTC              | percent to construct                                                                                                                 |
| SIC              | Standard Industrial Classification                                                                                                   |
| T/yr             | tons per year                                                                                                                        |

# AIR QUALITY TIER II OPERATING AND PERMIT TO CONSTRUCT NUMBER: T2-020029

|            |               |                             |               |               |
|------------|---------------|-----------------------------|---------------|---------------|
| Permittee: | Nelson Const. | AIRS Facility No. 777-00226 | Date Issued:  | July 21, 2003 |
| Location:  | Portable      |                             | Date Expires: | July 21, 2008 |

## 1. ~~PERMIT SCOPE~~

### ~~Purpose~~

~~1.1 The purpose of this permit is to limit PM<sub>10</sub> emissions from this facility as part of the Northern Ada County PM<sub>10</sub> Maintenance Plan.~~

~~1.2 This Tier II operating permit and permit to construct incorporates the following permit:~~

~~PTC No. 777-00226, issued October 15, 1998~~

### ~~Regulated Sources~~

~~1.3 Table 1.1 below lists all sources of emissions that are regulated in this permit.~~

~~Table 1.1 Sources Of Emissions~~

| Permit Section | Source Description                                                                                                                                                     | Emissions Control(s)          |
|----------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|
| <del>2</del>   | <del>All associated fugitive emissions from sand and aggregate transfers, crusher and screen decks, paved and unpaved haul roads, and wind erosion of stockpiles</del> | <del>Reasonable control</del> |
| <del>4</del>   | <del>Generator</del>                                                                                                                                                   | <del>None</del>               |

# AIR QUALITY TIER II OPERATING AND PERMIT TO CONSTRUCT NUMBER: T2-020029

|            |               |                             |                          |                          |
|------------|---------------|-----------------------------|--------------------------|--------------------------|
| Permittee: | Nelson Const. | AIRS Facility No. 777-00226 | Date Issued:             | July 21, 2003            |
| Location:  | Portable      |                             | <del>Date Expires:</del> | <del>July 21, 2006</del> |

## 2. FACILITY-WIDE CONDITIONS

The following table contains a summary of requirements that apply generally to emissions units at the facility.

**Table 2.1 SUMMARY OF REQUIREMENTS**

| Permit Condition | Parameter                          | Permit Limit/Standard Summary                                                 | Applicable Requirements Reference | Monitoring & Recordkeeping Requirements |
|------------------|------------------------------------|-------------------------------------------------------------------------------|-----------------------------------|-----------------------------------------|
| <del>2.4</del>   | <del>Fugitive dust</del>           | <del>Reasonable control</del>                                                 | <del>IDAPA 58.01.01.650-651</del> | <del>2.2, 2.3, 2.4</del>                |
| <del>2.5</del>   | <del>Odors</del>                   | <del>Reasonable control</del>                                                 | <del>IDAPA 58.01.01.775-776</del> | <del>2.9</del>                          |
| <del>2.7</del>   | <del>Visible emissions</del>       | <del>20% opacity for no more than three minutes in any 60 minute period</del> | <del>IDAPA 58.01.01.928</del>     | <del>2.9, 2.12</del>                    |
| <del>2.8</del>   | <del>Excess emissions</del>        | <del>Compliance with IDAPA 58.01.01.100-106</del>                             | <del>IDAPA 58.01.01.130</del>     | <del>2.9, 2.12</del>                    |
| <del>2.13</del>  | <del>Open burning</del>            | <del>Compliance with IDAPA 58.01.01.000-016</del>                             | <del>IDAPA 58.01.01.000-016</del> | <del>2.12</del>                         |
| <del>2.14</del>  | <del>Drain loading</del>           | <del>Compliance with IDAPA 58.01.01.070-077</del>                             | <del>IDAPA 58.01.01.070-077</del> | <del>2.7, 2.12</del>                    |
| <del>2.17</del>  | <del>Petroleum bulk contents</del> | <del>Compliance with IDAPA 58.01.01.190</del>                                 | <del>IDAPA 58.01.01.190</del>     | <del>2.12</del>                         |

### ~~Fugitive Emissions~~

~~2.1 All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651. 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 PM. Some of the reasonable precautions include, but are not limited to, the following:~~

- ~~• 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.~~
- ~~• 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.~~
- ~~• 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.~~
- ~~• Covering, where practical, of open bodied trucks transporting materials likely to give rise to airborne dusts.~~
- ~~• Paving of roadways and their maintenance in a clean condition, where practical.~~
- ~~• Prompt removal of earth or other stored material from streets, where practical.~~

# AIR QUALITY TIER II OPERATING AND PERMIT TO CONSTRUCT NUMBER: T2-020029

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| Location:  | Portable      |                             | Date Expires: | July 21, 2008 |

- ~~2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.~~
- ~~2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.~~
- ~~2.4 The permittee shall conduct a weekly facility wide inspection of potential sources of fugitive emissions during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each weekly fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.~~

## ~~Odors~~

- ~~2.5 No person shall allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.~~
- ~~2.6 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.~~

## ~~Visible Emissions~~

- ~~2.7 The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas is the only reason(s) for the failure of the emission to comply with the requirements of this section.~~
- ~~2.8 The permittee shall conduct a weekly facility wide inspection of visible emissions during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see evaluation. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, employ a progressive control strategy or strategies to mitigate the visible emissions, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. If a Method 9 opacity test is required, a minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136. Monitoring required to demonstrate compliance with Permit Condition 2.8 shall be conducted in accordance with Permit Condition 2.12.~~

## ~~Excess Emissions~~

- ~~2.9 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets, and breakdowns.~~

# AIR QUALITY TIER II OPERATING AND PERMIT TO CONSTRUCT NUMBER: T2-020029

|            |               |                             |               |               |
|------------|---------------|-----------------------------|---------------|---------------|
| Permittee: | Nelson Const. | AIRS Facility No. 777-00226 | Date Issued:  | July 21, 2003 |
| Location:  | Portable      |                             | Date Expires: | July 21, 2006 |

## ~~Reports and Certifications~~

~~2.10 Any reporting required by this permit, 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. Any reporting required by this permit shall be submitted to the following address:~~

~~Air Quality Permit Compliance  
Department of Environmental Quality  
Boise Regional Office  
1445 N. Orchard  
Boise, ID 83706~~

~~Any reporting required for New Source Performance Standards shall also be submitted to the EPA at the following address:~~

~~EPA Region 10  
Air Operating Permits, OAQ-107  
1200 Sixth Ave.  
Seattle, WA 98101~~

## ~~Air Stagnation Advisory Days~~

~~2.11 The permittee shall comply with the Air Pollution Emergency Rule in IDAPA 58.04.01.550-562.~~

## ~~Monitoring and Recordkeeping~~

2.12 The permittee shall maintain sufficient recordkeeping to ensure compliance with all the terms and conditions of this operating permit. 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 Department representatives upon request.

## ~~Open Burning~~

~~2.13 The permittee shall comply with the requirements of IDAPA 58.04.01.600-640, Rules for Control of Open Burning.~~

## ~~Fuel-burning Equipment~~

2.14 The permittee shall not discharge to the atmosphere from any fuel-burning equipment PM in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas, 0.050 gr/dscf of effluent gas corrected to 3% oxygen by volume for liquid, 0.050 gr/dscf of effluent gas corrected to 8% oxygen by volume for coal, and 0.080 gr/dscf of effluent gas corrected to 8% oxygen by volume for wood products.

## ~~Obligation to Comply~~

~~2.15 Receiving a permit shall not relieve any owner or operator of the responsibility to comply with all applicable local, state, and federal rules and regulations.~~

# AIR QUALITY TIER II OPERATING AND PERMIT TO CONSTRUCT NUMBER: T2-020029

|            |               |                             |                          |                          |
|------------|---------------|-----------------------------|--------------------------|--------------------------|
| Permittee: | Nelson Const. | AIRS Facility No. 777-00226 | Date Issued:             | July 21, 2003            |
| Location:  | Portable      |                             | <del>Date Expired:</del> | <del>July 21, 2008</del> |

## ~~Sulfur Content~~

~~2.16 No person shall sell, distribute, use, or make available for use any distillate fuel oil containing more than the following percentages of sulfur:~~

- ~~• ASTM Grade No. 1 fuel oil - 0.3% by weight.~~
- ~~• ASTM Grade No. 2 fuel oil - 0.5% by weight.~~

## ~~Relocation~~

~~2.17 At least 10 days prior to relocating any equipment covered by this permit, the permittee shall register all existing portable equipment using the Department's Portable Equipment Registration and Relocation Form (PERF) available on the Department's Website at [www.state.id.us/deq/air/equipregister.htm](http://www.state.id.us/deq/air/equipregister.htm). Each PERF, along with a scaled plot plan of the relocation site, shall be mailed to the following address:~~

~~PERF Processing Unit  
Idaho DEQ - Air Quality  
1440 N. Hiltien  
Boise, ID 83706-1256~~

# AIR QUALITY TIER II OPERATING AND PERMIT TO CONSTRUCT NUMBER: T2-020029

|            |               |                             |               |               |
|------------|---------------|-----------------------------|---------------|---------------|
| Permittee: | Nelson Const. | AIRS Facility No. 777-00226 | Date Issued:  | July 21, 2003 |
| Location:  | Portable      |                             | Date Expires: | July 21, 2008 |

## 3. ROCK-CRUSHING PLANT

### ~~3.1 Process Description~~

~~Rock crushing plants reduce the size of aggregate for various industrial and commercial purposes. Emissions from this rock crushing plant are limited to meet the requirements of the Northern Ada County PM<sub>10</sub> Maintenance Plan.~~

### ~~3.2 Control Description~~

~~The permittee is required to reasonably control fugitive dust at all times. Some methods that may be used to reasonably control fugitive emissions are listed in Permit Condition 2.1.~~

### ~~Emissions Limits~~

#### 3.3 Emissions Limits

The PM<sub>10</sub> emissions from the processes associated in the production of crushed material shall not exceed any corresponding emissions rate limits listed in the appendix of this permit.

[PTC No. 777-00226, 10/15/98]

### ~~Operating Requirements~~

#### 3.4 Throughput Limits

The maximum annual quantity of material entering the initial crusher shall not exceed 2,080,000 tons per any consecutive 12-month period.

#### ~~3.5 Opacity Limit~~

~~Emissions emanating from any stack, vent, or other functionally equivalent opening, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60 minute period as required in IDAPA 58.01.01.625. Opacity shall be determined using the procedures contained in IDAPA 58.01.01.625.~~

#### 3.6 Crusher Opacity Limit

The fugitive emissions from portable rock crushers shall not exhibit more than 15% opacity. Opacity shall be determined using the procedures specified in IDAPA 57.01.01.625.

[PTC No. 777-00226, 10/15/98]

#### 3.7 Transfer Point Opacity Limit

The fugitive emissions from any transfer point on belt conveyors, from each grinding mill, screening operation bucket elevator, belt conveyor bagging operation, storage bin, enclosed truck, or rail car loading, shall not exhibit greater than 10% opacity. Opacity shall be determined using the procedures specified in IDAPA 58.01.01.625.

[PTC No. 777-00226, 10/15/98]

#### ~~3.8 Paved and Unpaved Roads Opacity Limit~~

~~Fugitive dust emissions from vehicle traffic on any paved or unpaved haul road associated with the rock crushing plant regulated by this permit shall be controlled by water, an environmentally safe chemical soil stabilizer, or equivalent. Control strategies shall be employed whenever visible emissions are observed crossing the permitted facility boundary, as determined using Method 22.~~

**AIR QUALITY TIER II OPERATING AND PERMIT TO CONSTRUCT NUMBER: T2-020029**

|            |               |                             |                          |                          |
|------------|---------------|-----------------------------|--------------------------|--------------------------|
| Permittee: | Nelson Const. | AIRS Facility No. 777-00226 | Date Issued:             | July 21, 2003            |
| Location:  | Portable      |                             | <del>Date Expires:</del> | <del>July 21, 2008</del> |

**3.9 Number of Crushers and Generators**

This crushing facility may operate as a three-or four-crusher facility. The facility shall operate with only one 1250-kilowatt generator.

~~[PTC No. 777-00226, 10/15/98]~~

**3.10 Control Strategy**

Visible emissions are a trigger that requires initiation of a strategy or strategies to control fugitive dust emission from associated processes involved in the production of crushed material. Visible emissions from any of the associated processes not specifically regulated by this permit shall not exceed 20% opacity for a period or periods aggregating more than one minute in any 60-minute period. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

**Monitoring and Recordkeeping Requirements****3.11 Throughput Monitoring**

The permittee shall monitor and record the amount material entering the initial crusher each month and for the most recent 12-month period.

~~[PTC No. 777-00226, 10/15/98]~~

**3.12 Emissions Monitoring**

The facility has the option of operating either as a four-or three-crusher facility. When the facility is operating as a four-crusher facility, the PM<sub>10</sub> emissions shall be determined by multiplying the throughput of material passing through the initial crusher by the emission factor of 0.058 pounds of PM<sub>10</sub> emissions per ton of material throughput. When the facility is operating as a three-crusher facility, the PM<sub>10</sub> emissions shall be determined by multiplying the throughput of material passing through the initial crusher by the emission factor of 0.037 pounds of PM<sub>10</sub> emissions per ton of material throughput. The summation of the PM<sub>10</sub> emissions of these two operational setups shall not exceed the associated limit stated in the appendix of this permit.

**3.13 ~~Operations and Maintenance Manual Requirements~~**

~~Within 60 days after the date this permit is issued, the permittee shall have developed an O&M manual for rock crushing facility which describes the methods that will be used to control fugitive dust emissions. The manual shall describe the procedures that will be followed to comply with General Provision 2. This manual shall remain onsite at all times and shall be made available to Department representatives upon request.~~



**AIR QUALITY TIER II OPERATING AND PERMIT TO CONSTRUCT NUMBER: T2-020029**

|            |               |                             |               |               |
|------------|---------------|-----------------------------|---------------|---------------|
| Permittee: | Nelson Const. | AIRS Facility No. 777-00226 | Date Issued:  | July 21, 2003 |
| Location:  | Portable      |                             | Date Expires: | July 21, 2008 |

**4. GENERATOR****4.1 Process Description**

~~This rock crushing plant includes a 1250 kilowatt diesel fuel-fired generator that provides electrical power when line power is unavailable.~~

**4.2 Control Description**

~~Generator emissions are uncontrolled.~~

**~~Emissions Limits~~****4.3 Emissions Limits**

The NO<sub>x</sub> emissions from the generator shall not exceed any corresponding emissions rate limits listed in the appendix of this permit.

**Operating Requirements****4.4 Nonattainment Generator Monitoring**

When operating in a PM<sub>10</sub> nonattainment area as a four-crusher facility, the plant shall not operate more than 6301 hours per year.

~~[PTC No. 777-00226, 10/15/08]~~

When operating in a PM<sub>10</sub> nonattainment area as a three-crusher facility, the plant shall not exceed 8535 hours per year.

**4.5 Generator Operation**

The generator shall only operate while the crusher facility is in operation.

**Monitoring and Recordkeeping Requirements****4.6 Generator Monitoring**

When operating in a PM<sub>10</sub> nonattainment area, the permittee shall monitor and record the generator operating hours to demonstrate compliance with Permit Condition 4.4.

**AIR QUALITY TIER II OPERATING AND PERMIT TO CONSTRUCT NUMBER: T2-020029**

|                   |               |                                    |                      |               |
|-------------------|---------------|------------------------------------|----------------------|---------------|
| <b>Permittee:</b> | Nelson Const. | <b>AIRS Facility No. 777-00226</b> | <b>Date Issued:</b>  | July 21, 2003 |
| <b>Location:</b>  | Portable      |                                    | <b>Date Expires:</b> | July 21, 2008 |

**5. APPENDIX**

**Table 5.1 EMISSION LIMITS**

| Nelson Construction Co.<br>Emission Limits <sup>a</sup> - Hourly (lb/hr), and Annual <sup>b</sup> (T/yr) |                                                              |                                                             |                                                |                                               |
|----------------------------------------------------------------------------------------------------------|--------------------------------------------------------------|-------------------------------------------------------------|------------------------------------------------|-----------------------------------------------|
| Source Description                                                                                       | Hourly PM <sub>10</sub> <sup>c</sup><br>Emissions<br>(lb/hr) | Annual PM <sub>10</sub> <sup>c</sup><br>Emissions<br>(T/yr) | Hourly NO <sub>x</sub><br>Emissions<br>(lb/hr) | Annual NO <sub>x</sub><br>Emissions<br>(T/yr) |
| Generator                                                                                                | 0.64                                                         | 2                                                           | 31.2                                           | 98.3                                          |
| All associated process<br>emissions (fugitives included)                                                 | NA <sup>d</sup>                                              | 18                                                          | NA                                             | NA                                            |

<sup>a</sup> As determined by a pollutant-specific EPA reference method, a Department-approved alternative, or as determined by the Department's emissions estimation methods used in this permit analysis.

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

<sup>c</sup> Includes condensibles.

<sup>d</sup> NA Not applicable

# AIR QUALITY TIER II OPERATING AND PERMIT TO CONSTRUCT NUMBER: T2-020029

|            |               |                             |               |               |
|------------|---------------|-----------------------------|---------------|---------------|
| Permittee: | Nelson Const. | AIRS Facility No. 777-00226 | Date Issued:  | July 21, 2003 |
| Location:  | Portable      |                             | Date Expires: | July 21, 2008 |

## 6. GENERAL PROVISIONS

1. All emissions authorized herein shall be consistent with the terms and conditions of this permit. 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.
2. The permittee shall at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintain and operate in good working order all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
3. The permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
  - To enter upon the permittee's 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; and
  - 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 to require stack emissions testing (i.e., performance tests) in conformance with state-approved or accepted EPA procedures when deemed appropriate by the Director.
4. Except for data determined to be confidential under Section 9-342A *Idaho Code*, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Department of Environmental Quality.
5. 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.
6. In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter; a copy of which shall be forwarded to the Director.
7. This permit shall be renewable on the expiration date, provided the permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within 60 days after receipt of the Director's request shall cause the permit to become void.
8. The Director may require the permittee to develop a list of operation and maintenance procedures to be approved by the Department. Such list of procedures shall become a part of this permit by reference, and the permittee shall adhere to all of the operation and maintenance procedures contained therein.
9. 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.





**Air Pollution  
TIER II OPERATING PERMIT**

State of Idaho  
Department of Environmental Quality

PERMIT NO.: 001-00184

AQCR: 64

CLASS: SM

SIC: 1442

ZONE: 11

UTM COORDINATE (km): 554.95, 4835.356

**1. PERMITTEE**

Mike's Sand and Gravel

**2. PROJECT**

Tier II Operating Permit - Northern Ada County PM<sub>10</sub> Maintenance Plan

**3. MAILING ADDRESS**

20667 Franklin Road

**CITY**

Nampa

**STATE**

Idaho

**ZIP**

83687

**4. FACILITY CONTACT**

Mike Mulchay

**TITLE**

President

**TELEPHONE**

(208) 939-2000

**5. RESPONSIBLE OFFICIAL**

Mike Mulchay

**TITLE**

President

**TELEPHONE**

(208) 939-2000

**6. EXACT PLANT LOCATION**

2500 feet north of Joplin Road

**COUNTY**

Ada

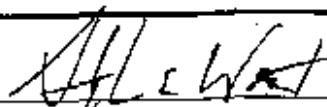
**7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**

Gravel Mining, Crushing, Retail Sales

**8. PERMIT AUTHORITY**

This permit is issued according to the *Rules for the Control of Air Pollution in Idaho*, Section 58.01.01.400 and pertains only to emissions of air contaminants which are regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit.

This permit has been granted on the basis of design information presented in the application and the Idaho Department of Environmental Quality's (Department) technical analysis of the supplied information. Changes in design or equipment, that result in any change in the nature or amount of emissions, may be a modification. Modifications are subject to the Department review in accordance with Section 58.01.01.200 of the *Rules for the Control of Air Pollution in Idaho*.

  
ADMINISTRATOR, BOISE REGIONAL OFFICE  
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: July 12, 2002

~~DATE EXPIRES: July 12, 2007~~

**SOURCE: Sand & Gravel Transfers, Crushers, Screens, Vehicle Traffic, and Associated Processes.**

**1. EMISSION LIMITS**

**1.1 Emissions Limits**

Particulate matter (PM), and particulate matter with an aerodynamic diameter less than or equal to a nominal ten micrometers (PM<sub>10</sub>) emissions from the sand and gravel transfers, crushers, screens, vehicle traffic, and wind erosion (stockpiles), shall not exceed the pounds per hour (lb/hr) and the tons per any 12-month period (T/yr) limits listed in the Appendix.

**1.2 Opacity Limits**

~~Emissions from the sand and gravel transfers, crushers, screens, vehicle traffic, and associated processes, or any other stock, vent, or functionally equivalent opening, shall not exceed the limit required by New Source Performance Standards (NSPS) Part 60 Subpart OOO and IDAPA 58.01.04.625 (Rules for the Control of Air Pollution in Idaho). Opacity shall be determined by the procedures contained in NSPS Part 60 Subpart OOO and IDAPA 58.01.04.625.~~

**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 Environmental Protection Agency Reference Method 22 (as described in 40 CFR 60), the Appendix, or a Department-approved alternative method.

**2. OPERATING REQUIREMENTS**

**2.1 Operating Procedures**

~~The sand and gravel transfers, crushers, screens, and associated processes shall be operated according to the respective operation and maintenance (O&M) manual and manufacturer's specifications during the operation.~~

**2.2.1 Sand and Gravel Mining**

The material processed shall not exceed 600,000 tons per any consecutive 12-month period.

**2.2.2 Performance Testing**

~~The permittee shall have a performance test on the appropriate source(s) as stated in 40 CFR Part 60 Subpart OOO. A copy is located in the Appendix.~~

Permittee: Mike's Sand and Gravel  
Location: Nampa, Idaho

Date Issued: July 12, 2002  
Date Expires: July 12, 2007

SOURCE: Sand & Gravel Transfers, Crushers, Screens, Vehicle Traffic, and Associated Processes.

~~2.3~~ Reasonable Control of Fugitive Emissions

~~As required in IDAPA 58.01.01.661, all reasonable precautions shall be taken to prevent PM from becoming airborne. 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 PM.~~

~~Some of the reasonable precautions include, but are not limited to, the following:~~

- ~~2.3.1 Using water or chemicals for controlling dust when demolishing existing buildings or structures, performing construction operations, grading roads, and clearing of lands;~~
- ~~2.3.2 Applying asphalt, water or suitable chemicals to, or covering dirt roads, material stockpiles, and other surfaces that can create dust;~~
- ~~2.3.3 Installing and using hoods, fans and fabric filters, or equivalent systems to enclose and vent the dusty materials. Adequate containment methods should be employed during sandblasting or other operations;~~
- ~~2.3.4 Covering open bodied trucks transporting materials likely to give rise to airborne dusts;~~
- ~~2.3.5 Paving of roadways and maintaining them in a clean condition; or~~
- ~~2.3.6 Promptly removing earth or other stored material from streets.~~

~~3.~~ MONITORING AND RECORDKEEPING REQUIREMENTS

3.1 Monitor Operation Parameters

The permittee shall monitor and record the amount of material processed on a consecutive 12-month basis. The most recent two years' compilation of records shall be kept onsite, in a record, and shall be made available to Department representatives upon request.

~~3.2~~ Operations and Maintenance (O&M) Manual Requirements

~~Within 60 days after permit issuance, the permittee shall have developed an O&M manual for the sand and gravel transfers, crushers, screens, vehicle traffic, and associated processes that describes the procedures followed to comply with General Provision D. This manual shall remain onsite at all times and shall be made available to Department representatives upon request.~~

~~3.3~~ New Source Performance Standards

~~The permittee shall perform all necessary recordkeeping that is applicable to the facility as stated within NPS Part 60 Subpart 600. A copy is located in the Appendix.~~

~~4.~~ REPORTING REQUIREMENTS

~~4.1~~ New Source Performance Standards

~~The permittee shall perform all necessary reporting that is applicable to the facility as stated within 40 CFR Part 60 Subpart 600. A copy is included in the Appendix.~~

SOURCE: Sand & Gravel Transfers, Crushers, Screens, Vehicle Traffic, and Associated Processes.

4.2 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 verifications, 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 TIER II OPERATING PERMIT NUMBER: 001-00184**

PERMITTEE: MIKE'S SAND AND GRAVEL  
 LOCATION: Nampa, IDAHO

DATE ISSUED: JULY 12, 2002  
~~DATE EXPIRES: JULY 12, 2007~~

**Appendix A**

**Appendix**

**Mike's Sand and Gravel**

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

| SOURCE                                                                                                | PM <sub>10</sub> <sup>e</sup> |      |
|-------------------------------------------------------------------------------------------------------|-------------------------------|------|
|                                                                                                       | lb/hr                         | T/yr |
| Emissions from sand and gravel transfers, crushers, screens, vehicle traffic and associated processes | 12.32                         | 18.5 |

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

<sup>b</sup> Pound per hour

<sup>c</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>d</sup> Tons per year

<sup>e</sup> Particulate matter with an aerodynamic diameter of 10 microns or less.

PERMITTEE: MIKE'S SAND AND GRAVEL  
LOCATION: NAMPA, IDAHO

DATE ISSUED: JULY 12, 2002  
DATE EXPIRES: JULY 12, 2007

## GENERAL PROVISIONS

### TIER II OPERATING PERMIT GENERAL PROVISIONS

- A. All emissions authorized herein shall be consistent with the terms and conditions of this permit. 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 and operate in good working order all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
- C. The permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
- 1) To enter upon the permittee's 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 to require stack emission testing (i.e., performance tests) in conformance with state approved or accepted Environmental Protection Agency (EPA) procedures when deemed appropriate by the Director.
- D. Except for data determined to be confidential under Section 9-342A, *Idaho Code*, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Department.
- E. 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.
- F. In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Director.
- G. This permit shall be renewable on the expiration date, provided the permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within 60 days after receipt of the Director's request shall cause the permit to be voided.
- H. The Director may require the permittee to develop a list of O&M procedures to be approved by the Department. Such list of procedures shall become a part of this permit by reference, and the permittee shall adhere to all of the operation and maintenance procedures contained therein.
- I. Performance tests (i.e., air emission source tests) conducted pursuant to testing requirements in this permit must be conducted in accordance with IDAPA 58.01.01.157. Such testing shall not be conducted on weekends or state holidays unless the permittee obtains prior Department approval.

The permittee shall submit a proposed test date for each performance test required by this permit to the Department for approval at least 15 days prior to each respective test date (including each test date for periodic tests such as, for example, annual tests). The permittee shall promptly notify the Department of any change in the proposed test date and shall provide at least five working days advanced notice prior to conducting any re-scheduled test, unless the Department approves a shorter notice period.

Within 30 days of the date on which a performance test required by this permit is concluded, the permittee shall submit to the Department a performance test report for the respective test. The performance test report shall

AIR QUALITY TIER II OPERATING PERMIT NUMBER: 001-00184

PERMITTEE: MIKE'S SAND AND GRAVEL  
LOCATION: NAMPA, IDAHO

DATE ISSUED: JULY 12, 2002  
DATE EXPIRES: JULY 12, 2007

**GENERAL PROVISIONS**

include any and all process operating data required to be recorded during the test period as well as the test results, raw test data, and associated documentation.

The maximum allowable source operating rate shall be limited to 120 percent of the average operating rate attained during the most recent performance test conducted pursuant to this permit, for which a test protocol has been granted prior approval by the Department, which demonstrated compliance with the respective pollutant emission limit unless (1) a more restrictive operating limit is specified elsewhere in this permit, or (2) at such an operating rate, emissions would exceed any emission limit(s) set forth in this permit.

- J. The provisions of this permit are severable; 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.





**Air Quality  
TIER II OPERATING PERMIT  
and  
PERMIT TO CONSTRUCT**

State of Idaho  
Department of Environmental Quality

PERMIT NO.: T2-020031

AIRS FACILITY NO.: 777-00106

SIC: 3273 CLASS: SM

UTM COORDINATE (km): PORTABLE

**1. PERMITTEE**

Idaho Concrete Co.

**2. PROJECT**

Tier II Operating Permit and Permit to Construct

**3. MAILING ADDRESS**

P.O. Box 789, 2755 E. State St.

**CITY**

Eagle

**STATE**

ID

**ZIP**

83616

**4. FACILITY CONTACT**

Eric St. Pierre

**TITLE**

Operations Manager

**TELEPHONE**

(208) 939-6831

**5. RESPONSIBLE OFFICIAL**

Eric St. Pierre

**TITLE**

Operations Manager

**TELEPHONE**

(208) 939-6831

**6. EXACT PLANT LOCATION**

Portable

**COUNTY**

Ada

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

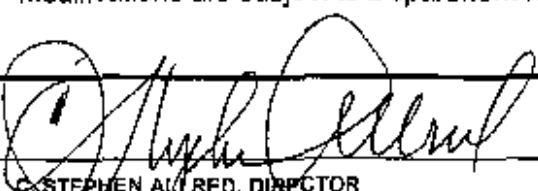
Production of ready-mix concrete

**8. PERMIT AUTHORITY**

This permit is issued according to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.400-470 and IDAPA 58.01.01.200-228. This permit pertains only to emissions of air contaminants, which are regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit. Only the terms and conditions pertaining to Tier II operating permit requirements are subject to the expiration date of this permit.

This permit is not transferable to another person, place, or piece or set of equipment. This permit will expire if construction has not yet 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 in the application and the Idaho Department of Environmental Quality's technical analysis of the supplied information. Changes in design or equipment that result in any change in the nature or amount of emissions may be considered a modification. Modifications are subject to Department review in accordance with IDAPA 58.01.01.200 et seq.

  
STEPHEN ALLRED, DIRECTOR  
DEPARTMENT OF ENVIRONMENTAL QUALITY

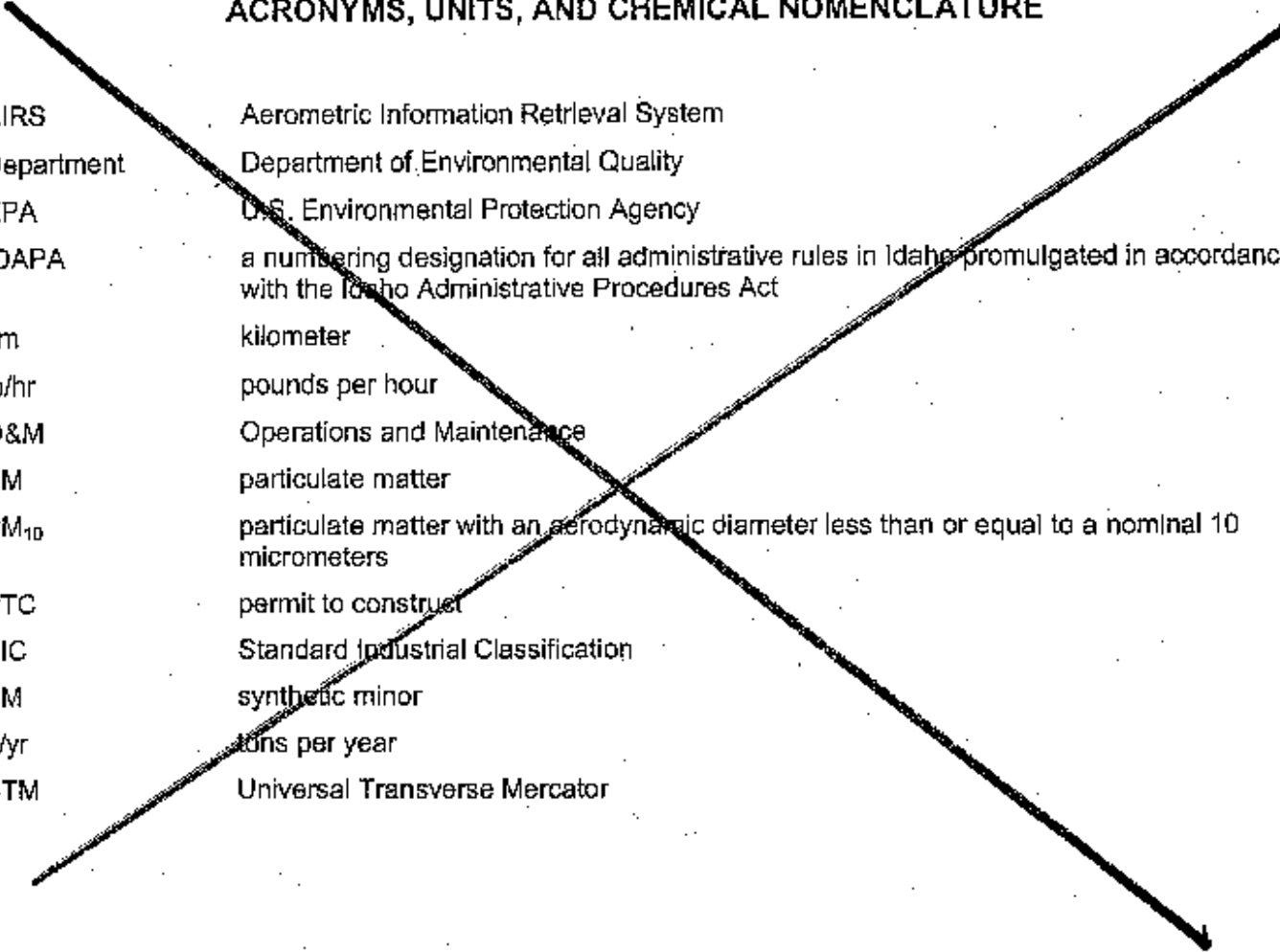
DATE ISSUED: July 8, 2003

DATE EXPIRES: July 8, 2008

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## ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE



|                  |                                                                                                                                      |
|------------------|--------------------------------------------------------------------------------------------------------------------------------------|
| AIRS             | Aerometric Information Retrieval System                                                                                              |
| Department       | Department of Environmental Quality                                                                                                  |
| EPA              | U.S. Environmental Protection Agency                                                                                                 |
| IDAPA            | a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act |
| km               | kilometer                                                                                                                            |
| lb/hr            | pounds per hour                                                                                                                      |
| O&M              | Operations and Maintenance                                                                                                           |
| PM               | particulate matter                                                                                                                   |
| PM <sub>10</sub> | particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers                                       |
| PTC              | permit to construct                                                                                                                  |
| SIC              | Standard Industrial Classification                                                                                                   |
| SM               | synthetic minor                                                                                                                      |
| T/yr             | tons per year                                                                                                                        |
| UTM              | Universal Transverse Mercator                                                                                                        |

# AIR QUALITY TIER II OPERATING AND PERMIT TO CONSTRUCT NUMBER: T2-020031

|            |                    |                             |               |              |
|------------|--------------------|-----------------------------|---------------|--------------|
| Permittee: | Idaho Concrete Co. | AIRS Facility No. 777-00106 | Date Issued:  | July 8, 2003 |
| Location:  | Portable           |                             | Date Expires: | July 8, 2009 |

## 1 PERMIT SCORE

### Purpose

1.1 ~~The purpose of this permit is to limit PM<sub>10</sub> emissions from this facility as part of the Northern Ada County PM<sub>10</sub> Maintenance Plan.~~

1.2 ~~This Tier II operating permit and permit to construct incorporates the following permit:~~

~~DTG No. 777-00106, issued February 1, 2000~~

### Regulated Sources

1.3 ~~Table 1.1 lists all sources of emissions that are regulated in this permit.~~

**Table 1.1 EMISSIONS SOURCES**

| Permit Section | Source Description                                                                                                                                                              | Emissions Control(s)          |
|----------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|
| <del>6</del>   | <del>Cement storage silo</del>                                                                                                                                                  | <del>Baghouse</del>           |
| <del>7</del>   | <del>All associated fugitive emissions from the following: sand and aggregate transfers, weigh hopper loading, stockpiling, vehicle traffic, and maintenance of equipment</del> | <del>Reasonable control</del> |



# AIR QUALITY TIER II OPERATING AND PERMIT TO CONSTRUCT NUMBER: T2-020031

|            |                    |                             |               |              |
|------------|--------------------|-----------------------------|---------------|--------------|
| Permittee: | Idaho Concrete Co. | AIRS Facility No. 777-00106 | Date Issued:  | July 8, 2003 |
| Location:  | Portable           |                             | Date Expires: | July 8, 2008 |

## 2. FACILITY-WIDE CONDITIONS

The following table contains a summary of requirements that apply generally to emissions units at the facility:

~~Table 2.1 SUMMARY OF REQUIREMENTS~~

| Permit Condition | Parameter               | Permit Limit/Standard Summary                                      | Applicable Requirements Reference | Monitoring & Recordkeeping Requirements |
|------------------|-------------------------|--------------------------------------------------------------------|-----------------------------------|-----------------------------------------|
| 2.1              | Fugitive dust           | Reasonable control                                                 | IDAPA 58.01.01.650-651            | 2.2, 2.3, 2.4, 2.5, 2.13                |
| 2.8              | Odors                   | Reasonable control                                                 | IDAPA 58.01.01.775-776            | 2.7, 2.13                               |
| 2.8              | Visible emissions       | 20% opacity for no more than three minutes in any 60-minute period | IDAPA 58.01.01.825                | 2.9, 2.13                               |
| 2.10             | Excess emissions        | Compliance with IDAPA 58.01.01.130-136                             | IDAPA 58.01.01.130-136            | 2.13                                    |
| 2.12             | Air stagnation advisory | Compliance with IDAPA 58.01.01.550-562                             | IDAPA 58.01.01.550-562            | 2.13                                    |
| 2.14             | Open burning            | In accordance with IDAPA 58.01.01.600-616                          | IDAPA 58.01.01.600-616            | 2.13                                    |

### ~~Fugitive Dust~~

~~2.1 All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651. 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 PM. Some of the reasonable precautions include, but are not limited to, the following:~~

- ~~• 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.~~
- ~~• 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.~~
- ~~• 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.~~
- ~~• Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts.~~
- ~~• Paving of roadways and their maintenance in a clean condition, where practical.~~
- ~~• Prompt removal of earth or other stored material from streets, where practical.~~

# AIR QUALITY TIER II OPERATING AND PERMIT TO CONSTRUCT NUMBER: T2-020031

|            |                    |                             |               |              |
|------------|--------------------|-----------------------------|---------------|--------------|
| Permittee: | Idaho Concrete Co. | AIRS Facility No. 777-00106 | Date Issued:  | July 8, 2003 |
| Location:  | Portable           |                             | Date Expires: | July 8, 2008 |

- ~~2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (non water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.~~
- ~~2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.~~
- ~~2.4 The permittee shall conduct a weekly facility wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions, to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each weekly fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.~~
- 2.5 Visible emissions are a trigger that requires the initiation of a strategy or strategies to control fugitive dust emission from associated processes of a concrete batch plant such as weigh hopper, sand and aggregate transfer, truck mixing, paved and unpaved roads, and stockpiles. Emissions from any of the associated processes and roads shall not exceed 20% opacity for a period or periods aggregating more than one minute in any 60-minute period. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

## Oders

- ~~2.6 No person shall allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.~~
- ~~2.7 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.~~

## Visible Emissions

- ~~2.8 The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas are the only reason(s) for the failure of the emission to comply with the requirements of this section.~~
- ~~2.9 The permittee shall conduct a weekly facility wide inspection of potential sources of visible emissions during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see evaluation for each potential source. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee~~

# AIR QUALITY TIER II OPERATING AND PERMIT TO CONSTRUCT NUMBER: T2-020031

|            |                    |                             |               |              |
|------------|--------------------|-----------------------------|---------------|--------------|
| Permittee: | Idaho Concrete Co. | AIRS Facility No. 777-00106 | Date Issued:  | July 8, 2003 |
| Location:  | Portable           |                             | Date Expires: | July 8, 2008 |

~~shall take all necessary corrective action and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each weekly visible emissions inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.~~

## ~~Excess Emissions~~

~~2.10 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets, and breakdowns.~~

## ~~Reports and Certifications~~

~~2.11 Any reporting required by this permit, 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. Any reporting required by this permit shall be submitted to the following:~~

~~Air Quality Permit Compliance  
Department of Environmental Quality  
Boise Regional Office  
1445 N. Orchard  
Boise, ID 83706~~

## ~~Air Stagnation Advisory Days~~

~~2.12 The permittee shall comply with the Air Pollution Emergency Rules in IDAPA 58.01.01.550-560.~~

## ~~Monitoring and Recordkeeping~~

2.13 The permittee shall maintain sufficient recordkeeping to ensure compliance with all the terms and conditions of this operating permit. Records of monitoring information shall include, but not limited to the following: (a) the date, place, and times of sampling or measurement; (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 measurements. 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 Department representatives upon request.

# AIR QUALITY TIER II OPERATING AND PERMIT TO CONSTRUCT NUMBER: T2-020031

|            |                    |                             |                          |                         |
|------------|--------------------|-----------------------------|--------------------------|-------------------------|
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| Location:  | Portable           |                             | <del>Date Expires:</del> | <del>July 8, 2008</del> |

## ~~Open Burning~~

~~2.14 The permittee shall comply with the requirements of IDAPA 58.01.01.600.616, Rules for Control of Open Burning.~~

## ~~Obligation to Comply~~

~~2.15 Receiving a Tier II operating permit shall not relieve any owner or operator of the responsibility to comply with all applicable local, state, and federal rules and regulations.~~

## ~~Relocation~~

~~2.16 At least 40 days prior to relocating any equipment covered by this permit, the permittee shall register all existing portable equipment using the Department's Portable Equipment Registration and Relocation Form (PERF) available on the Department's Website at [www.state.id.us/deq/air/equiprelocat.htm](http://www.state.id.us/deq/air/equiprelocat.htm). Each PERF, along with a sealed plot plan of the relocation site, shall be mailed to the following address:~~

~~PERF Processing Unit  
Idaho DEQ - Air Quality  
1440 N. Milton  
Boise, ID 83706-1255~~

# AIR QUALITY TIER II OPERATING AND PERMIT TO CONSTRUCT NUMBER: T2-020031

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## 3. CEMENT STORAGE SILO

### ~~3.1 Process Description~~

~~The purpose for the cement storage silo is to store cement for use in the production of concrete.~~

### ~~3.2 Control Description~~

~~Particulate matter emissions from the pneumatic loading of cement from a delivery truck to the cement storage silo are controlled by a baghouse.~~

## ~~Emissions Limits~~

### 3.3 Emissions Limits

Emissions of PM<sub>10</sub> from cement silo loading shall not exceed any corresponding emissions rate limits listed in the appendix of this permit.

~~PTC No. 777-00106, 2/4/03~~

## ~~Operating Requirements~~

### 3.4 Throughput Limits

The maximum annual production of concrete shall not exceed 500,000 cubic yards per any consecutive 12-month period.

### ~~3.5 Operations and Maintenance Manual Requirements~~

~~Within 60 days after startup, the permittee shall have developed an O&M manual for the cement storage silo baghouse describing the procedures that shall be followed to comply with General Provision 5.2 and the baghouse pressure drop requirements contained in this permit. The manual shall remain onsite at all times and shall be made available to Department representatives upon request.~~

### 3.6 Monitoring Equipment

The permittee shall install, calibrate, maintain, and operate, in accordance with manufacturer specifications, a pressure drop monitoring device to measure the pressure differential across the cement storage silo baghouse.

### 3.7 Pressure Drop Across Air Pollution Control Device

The pressure drop across the cement storage silo baghouse shall be maintained within manufacturer and O&M manual specifications. Documentation of both manufacturer and O&M manual operating pressure drop specifications shall remain onsite at all times and shall be made available to Department representatives upon request.

| AIR QUALITY TIER II OPERATING AND PERMIT TO CONSTRUCT NUMBER: T2-020031 |                    |                             |                                       |
|-------------------------------------------------------------------------|--------------------|-----------------------------|---------------------------------------|
| Permittee:                                                              | Idaho Concrete Co. | AIRS Facility No. 777-00106 | Date Issued: July 8, 2003             |
| Location:                                                               | Portable           |                             | <del>Date Expires: July 8, 2008</del> |

### ***Monitoring and Recordkeeping Requirements***

#### **3.8 Operating Parameters**

The permittee shall monitor and record the following information:

- Pressure drop reading across the cement storage silo baghouse once each time the cement storage silo is loaded.
- Concrete production in cubic yards per month and cubic yards per year. Monthly concrete production shall be summed over the previous consecutive 12-month period to demonstrate compliance with Permit Condition 3.4.

These records shall be maintained in accordance with Permit Condition 2.13.

**[ETC No. 777-00106, 2/4/08]**

**AIR QUALITY TIER II OPERATING AND PERMIT TO CONSTRUCT NUMBER: T2-020031**

|                   |                    |                                    |                                 |                         |
|-------------------|--------------------|------------------------------------|---------------------------------|-------------------------|
| <b>Permittee:</b> | Idaho Concrete Co. | <b>AIRS Facility No.</b> 777-00106 | <b>Date Issued:</b>             | July 8, 2003            |
| <b>Location:</b>  | Portable           |                                    | <del><b>Date Expires:</b></del> | <del>July 8, 2008</del> |

**4. APPENDIX****Table 4.1 EMISSION LIMITS**

| Idaho Concrete Co.<br>Emission Limits <sup>a</sup> - Hourly (lb/hr), and Annual <sup>b</sup> (T/yr) |                                                              |                                                             |
|-----------------------------------------------------------------------------------------------------|--------------------------------------------------------------|-------------------------------------------------------------|
| Source Description                                                                                  | Hourly PM <sub>10</sub> <sup>c</sup><br>Emissions<br>(lb/hr) | Annual PM <sub>10</sub> <sup>c</sup><br>Emissions<br>(T/yr) |
| Cement storage silo                                                                                 | 3.7                                                          | 0.6                                                         |
| All associated process emissions (fugitives included)                                               |                                                              | 19.4                                                        |

<sup>a</sup> As determined by a pollutant-specific EPA reference method, a Department-approved alternative, or as determined by the Department's emissions estimation methods used in this permit analysis.

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

<sup>c</sup> Includes condensibles.

# AIR QUALITY TIER II OPERATING AND PERMIT TO CONSTRUCT NUMBER: T2-020031

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## 5. GENERAL PROVISIONS

- 5.1 All emissions authorized herein shall be consistent with the terms and conditions of this permit. 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.
- 5.2 The permittee shall at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintain and operate in good working order all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
- 5.3 The permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
- To enter upon the permittee's 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; and
  - 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 to require stack emissions testing (i.e., performance tests) in conformance with state-approved or accepted EPA procedures when deemed appropriate by the Director.
- 5.4 Except for data determined to be confidential under Section 9-342A *Idaho Code*, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Department of Environmental Quality.
- 5.5 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.
- 5.6 In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Director.
- 5.7 This permit shall be renewable on the expiration date, provided the permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within 60 days after receipt of the Director's request shall cause the permit to become void.
- 5.8 The Director may require the permittee to develop a list of operation and maintenance procedures to be approved by the Department. Such list of procedures shall become a part of this permit by reference, and the permittee shall adhere to all of the operation and maintenance procedures contained therein.
- 5.9 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.





**Air Quality  
TIER II OPERATING PERMIT  
and  
PERMIT TO CONSTRUCT**

State of Idaho  
Department of Environmental Quality

PERMIT NO.: T2-020032

AIRS FACILITY NO.: 777-00113

SIC: 3273 CLASS: SM

UTM COORDINATE (km): PORTABLE

**1. PERMITTEE**

Idaho Concrete Co.

**2. PROJECT**

Tier II Operating Permit and Permit to Construct

**3. MAILING ADDRESS**

P.O. Box 789, 2755 E. State St.

**CITY**

Eagle

**STATE**

ID

**ZIP**

83616

**4. FACILITY CONTACT**

Eric St. Pierre

**TITLE**

Operations Manager

**TELEPHONE**

(208) 939-6831

**5. RESPONSIBLE OFFICIAL**

Eric St. Pierre

**TITLE**

Operations Manager

**TELEPHONE**

(208) 939-6831

**6. EXACT PLANT LOCATION**

Portable

**COUNTY**

Ada

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

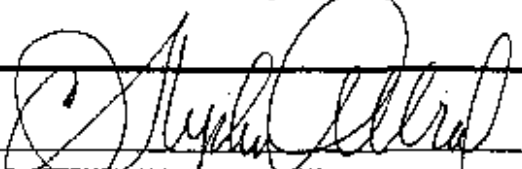
Production of ready-mix concrete

**8. PERMIT AUTHORITY**

This permit is issued according to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.400-470 and IDAPA 58.01.01.200-228. This permit pertains only to emissions of air contaminants, which are regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit. Only the terms and conditions pertaining to Tier II operating permit requirements are subject to the expiration date of this permit.

This permit is not transferable to another person, place, or piece or set of equipment. This permit will expire if construction has not yet 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 in the application and the Idaho Department of Environmental Quality's technical analysis of the supplied information. Changes in design or equipment that result in any change in the nature or amount of emissions may be considered a modification. Modifications are subject to Department review in accordance with IDAPA 58.01.01.200 et seq.

  
S. STEPHEN ALLRED, DIRECTOR

DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: July 8, 2003

DATE EXPIRES: ~~July 8, 2005~~

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## ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

|                  |                                                                                                                                      |
|------------------|--------------------------------------------------------------------------------------------------------------------------------------|
| AIRS             | Aerometric Information Retrieval System                                                                                              |
| Department       | Department of Environmental Quality                                                                                                  |
| EPA              | U.S. Environmental Protection Agency                                                                                                 |
| IDAPA            | a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act |
| km               | kilometer                                                                                                                            |
| lb/hr            | pounds per hour                                                                                                                      |
| O&M              | Operations and Maintenance                                                                                                           |
| PM               | particulate matter                                                                                                                   |
| PM <sub>10</sub> | particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers                                       |
| PTC              | permit to construct                                                                                                                  |
| SIC              | Standard Industrial Classification                                                                                                   |
| SM               | synthetic minor                                                                                                                      |
| T/yr             | tons per year                                                                                                                        |
| UTM              | Universal Transverse Mercator                                                                                                        |

# AIR QUALITY TIER II OPERATING AND PERMIT TO CONSTRUCT NUMBER: T2-020032

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## ~~4. PERMIT SCOPE~~

### ~~Purpose~~

- ~~1.1 The purpose of this permit is to limit PM<sub>10</sub> emissions from this facility as part of the Northern Ada County CM<sub>10</sub> Maintenance Plan.~~
- ~~1.2 This Tier II operating permit and permit to construct incorporates the following permit:~~
- ~~PTC No. 777-00113, issued August 3, 2000~~

### ~~Regulated Sources~~

- ~~1.3 Table 1.1 lists all sources of emissions that are regulated in this permit.~~

~~Table 1.1 EMISSIONS SOURCES~~

| <del>Permit Section</del> | <del>Source Description</del>                                                                                                                                                    | <del>Emissions Control(s)</del> |
|---------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|
| <del>2</del>              | <del>Cement storage pile</del>                                                                                                                                                   | <del>Baghouse</del>             |
| <del>4</del>              | <del>All associated fugitive emissions from the following: sand and aggregate transfer, weigh house loading, truck mixing, vehicle traffic, and wind erosion of stockpiles</del> | <del>Reasonable control</del>   |

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## 2. FACILITY-WIDE CONDITIONS

The following table contains a summary of requirements that apply generally to emissions units at the facility:

**Table 2.1 SUMMARY OF REQUIREMENTS**

| Permit Condition | Parameter                         | Permit Limit/Standard Summary                                                 | Applicable Requirements Reference | Monitoring & Recordkeeping Requirements |
|------------------|-----------------------------------|-------------------------------------------------------------------------------|-----------------------------------|-----------------------------------------|
| <del>2.1</del>   | <del>Fugitive dust</del>          | <del>Reasonable control</del>                                                 | <del>IDAPA 58.01.01.650-654</del> | <del>2.9, 2.10, 2.14, 2.15, 2.16</del>  |
| <del>2.6</del>   | <del>Odors</del>                  | <del>Reasonable control</del>                                                 | <del>IDAPA 58.01.01.775-776</del> | <del>2.7, 2.13</del>                    |
| <del>2.8</del>   | <del>Visible emissions</del>      | <del>99% opacity for no more than three minutes in any 60-minute period</del> | <del>IDAPA 58.01.01.625</del>     | <del>2.9, 2.13</del>                    |
| <del>2.10</del>  | <del>Excess emissions</del>       | <del>Compliance with IDAPA 58.01.01.130-136</del>                             | <del>IDAPA 58.01.01.130-136</del> | <del>2.13</del>                         |
| <del>2.12</del>  | <del>Air cleanness advisory</del> | <del>Compliance with IDAPA 58.01.01.550-562</del>                             | <del>IDAPA 58.01.01.550-562</del> | <del>2.13</del>                         |
| <del>2.14</del>  | <del>Open burning</del>           | <del>In accordance with IDAPA 58.01.01.600-616</del>                          | <del>IDAPA 58.01.01.600-616</del> | <del>2.13</del>                         |

### ~~Fugitive Dust~~

~~2.1 All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-654. 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 PM. Some of the reasonable precautions include, but are not limited to, the following:~~

- ~~• 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.~~
- ~~• 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.~~
- ~~• 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.~~
- ~~• Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts.~~
- ~~• Paving of roadways and their maintenance in a clean condition, where practical.~~
- ~~• Prompt removal of earth or other stored material from streets, where practical.~~

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~~2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.~~

~~2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.~~

~~2.4 The permittee shall conduct a weekly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions, to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each weekly fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.~~

2.5 Visible emissions are a trigger that requires the initiation of a strategy or strategies to control fugitive dust emission from associated processes of a concrete batch plant such as weigh hopper, sand and aggregate transfer, truck mixing, paved and unpaved roads, and stockpiles. Emissions from any of the associated processes and roads shall not exceed 20% opacity for a period or periods aggregating more than one minute in any 60-minute period. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

## Odors

~~2.6 No person shall allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.~~

~~2.7 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.~~

## Visible Emissions

~~2.8 The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas are the only reason(s) for the failure of the emission to comply with the requirements of this section.~~

~~2.9 The permittee shall conduct a weekly facility-wide inspection of potential sources of visible emissions during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see evaluation for each potential source. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee~~

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~~shall take all necessary corrective action and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each weekly visible emissions inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.~~

**~~Excess Emissions~~**

~~2.10 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets, and breakdowns.~~

**~~Reports and Certifications~~**

~~2.11 Any reporting required by this permit, 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. Any reporting required by this permit shall be submitted to the following.~~

~~Air Quality Permit Compliance  
Department of Environmental Quality  
Boise Regional Office  
1415 N. Orchard  
Boise, ID 83706~~

**~~Air Stagnation Advisory Days~~**

~~2.12 The permittee shall comply with the Air Pollution Emergency Rules in IDAPA 58.01.01.550-562.~~

**~~Monitoring and Recordkeeping~~**

2.13 The permittee shall maintain sufficient recordkeeping to ensure compliance with all the terms and conditions of this operating permit. Records of monitoring information shall include, but not limited to the following: (a) the date, place, and times of sampling or measurement; (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 measurements. 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 Department representatives upon request.

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**Open Burning**

~~2.11 The permittee shall comply with the requirements of IDAPA 58.01.01.600-616, Rules for Control of Open Burning.~~

**Obligation to Comply**

~~2.15 Receiving a Tier II operating permit shall not relieve any owner or operator of the responsibility to comply with all applicable local, state, and federal rules and regulations.~~

**Relocation**

~~2.16 At least 10 days prior to relocating any equipment covered by this permit, the permittee shall register all existing portable equipment using the Department's Portable Equipment Registration and Relocation Form (PERF) available on the Department's Website at [www.state.id.us/daq/air/equip/relact.htm](http://www.state.id.us/daq/air/equip/relact.htm). Each PERF, along with a scaled plot plan of the relocation site, shall be mailed to the following address:~~

~~PERF Processing Unit  
Helm DEQ Air Quality  
1440 N. Hillman  
Boise, ID 83706-1266~~



# AIR QUALITY TIER II OPERATING AND PERMIT TO CONSTRUCT NUMBER: T2-020032

|            |                    |                             |               |              |
|------------|--------------------|-----------------------------|---------------|--------------|
| Permittee: | Idaho Concrete Co. | AIRS Facility No. 777-00113 | Date Issued:  | July 8, 2003 |
| Location:  | Portable           |                             | Date Expires: | July 8, 2008 |

## 3. CEMENT STORAGE SILO

### 3.1 Process Description

~~The purpose for the cement storage silo is to store cement for use in the production of concrete.~~

### 3.2 Control Description

~~Particulate matter emissions from the pneumatic loading of cement from a delivery truck to the cement storage silo are controlled by a baghouse.~~

## ~~Emissions Limits~~

### 3.3 Emissions Limits

Emissions of PM<sub>10</sub> from cement silo loading shall not exceed any corresponding emissions rate limits listed in the appendix of this permit.

~~(PTE No. 777-00113, 8/3/00)~~

## Operating Requirements

### 3.4 Throughput Limits

The maximum annual production of concrete shall not exceed 600,000 cubic yards per any consecutive 12-month period.

### 3.5 Operations and Maintenance Manual Requirements

~~Within 60 days after startup, the permittee shall have developed an O&M manual for the cement storage silo baghouse describing the procedures that shall be followed to comply with General Provision 5.2 and the baghouse pressure drop requirements contained in this permit. The manual shall remain onsite at all times and shall be made available to Department representatives upon request.~~

### 3.6 Monitoring Equipment

The permittee shall install, calibrate, maintain, and operate, in accordance with manufacturer specifications, a pressure drop monitoring device to measure the pressure differential across the cement storage silo baghouse.

### 3.7 Pressure Drop Across Air Pollution Control Device

The pressure drop across the cement storage silo baghouse shall be maintained within manufacturer and O&M manual specifications. Documentation of both manufacturer and O&M manual operating pressure drop specifications shall remain onsite at all times and shall be made available to Department representatives upon request.

**AIR QUALITY TIER II OPERATING AND PERMIT TO CONSTRUCT NUMBER: T2-020032**

|            |                    |                             |                          |                         |
|------------|--------------------|-----------------------------|--------------------------|-------------------------|
| Permittee: | Idaho Concrete Co. | AIRS Facility No. 777-00113 | Date Issued:             | July 8, 2003            |
| Location:  | Portable           |                             | <del>Date Expires:</del> | <del>July 8, 2006</del> |

**Monitoring and Recordkeeping Requirements****3.8 Operating Parameters**

The permittee shall monitor and record the following information:

- Pressure drop reading across the cement storage silo baghouse once each time the cement storage silo is loaded.
- Concrete production in cubic yards per month and cubic yards per year. Monthly concrete production shall be summed over the previous consecutive 12-month period to demonstrate compliance with Permit Condition 3.4.

These records shall be maintained in accordance with Permit Condition 2.13.

~~PTC No. 777-00113, 0/3/00~~

**AIR QUALITY TIER II OPERATING AND PERMIT TO CONSTRUCT NUMBER: T2-020032**

|                   |                    |                                    |                      |              |
|-------------------|--------------------|------------------------------------|----------------------|--------------|
| <b>Permittee:</b> | Idaho Concrete Co. | <b>AIRS Facility No. 777-00113</b> | <b>Date Issued:</b>  | July 8, 2003 |
| <b>Location:</b>  | Portable           |                                    | <b>Date Expires:</b> | July 8, 2009 |

**4. APPENDIX**

**Table 4.1 EMISSION LIMITS**

| Idaho Concrete Co.<br>Emission Limits <sup>a</sup> - Hourly (lb/hr), and Annual <sup>b</sup> (T/yr) |                                                              |                                                             |
|-----------------------------------------------------------------------------------------------------|--------------------------------------------------------------|-------------------------------------------------------------|
| Source Description                                                                                  | Hourly PM <sub>10</sub> <sup>c</sup><br>Emissions<br>(lb/hr) | Annual PM <sub>10</sub> <sup>c</sup><br>Emissions<br>(T/yr) |
| Cement storage silo                                                                                 | 0.4                                                          | 1.6                                                         |
| All associated process emissions (fugitives included)                                               |                                                              | 18.4                                                        |

<sup>a</sup> As determined by a pollutant-specific EPA reference method, a Department-approved alternative, or as determined by the Department's emissions estimation methods used in this permit analysis.

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

<sup>c</sup> Includes condensibles.

# AIR QUALITY TIER II OPERATING AND PERMIT TO CONSTRUCT NUMBER: T2-020032

|            |                    |                             |                          |                         |
|------------|--------------------|-----------------------------|--------------------------|-------------------------|
| Permittee: | Idaho Concrete Co. | AIRS Facility No. 777-00113 | Date Issued:             | July 8, 2003            |
| Location:  | Portable           |                             | <del>Date Expires:</del> | <del>July 8, 2000</del> |

## 5. GENERAL PROVISIONS

- 5.1 All emissions authorized herein shall be consistent with the terms and conditions of this permit. 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.
- 5.2 The permittee shall at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintain and operate in good working order all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
- 5.3 The permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
- To enter upon the permittee's 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; and
  - 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 to require stack emissions testing (i.e., performance tests) in conformance with state-approved or accepted EPA procedures when deemed appropriate by the Director.
- 5.4 Except for data determined to be confidential under Section 9-342A *Idaho Code*, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Department of Environmental Quality.
- 5.5 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.
- 5.6 In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter; a copy of which shall be forwarded to the Director.
- 5.7 This permit shall be renewable on the expiration date, provided the permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within 60 days after receipt of the Director's request shall cause the permit to become void.
- 5.8 The Director may require the permittee to develop a list of operation and maintenance procedures to be approved by the Department. Such list of procedures shall become a part of this permit by reference, and the permittee shall adhere to all of the operation and maintenance procedures contained therein.
- 5.9 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.



**Air Quality  
TIER II OPERATING PERMIT  
and  
PERMIT TO CONSTRUCT**

State of Idaho  
Department of Environmental Quality

PERMIT NO.: T2-020033

AIRS FACILITY NO.: 777-00151

SIC: 3273 CLASS: SM

UTM COORDINATE (km): PORTABLE

**1. PERMITTEE**

Idaho Concrete Co.

**2. PROJECT**

Tier II Operating Permit and Permit to Construct

**3. MAILING ADDRESS**

P.O. Box 789, 2755 E. State St.

**CITY**

Eagle

**STATE**

ID

**ZIP**

83616

**4. FACILITY CONTACT**

Eric St. Pierre

**TITLE**

Operations Manager

**TELEPHONE**

(208) 939-6831

**5. RESPONSIBLE OFFICIAL**

Eric St. Pierre

**TITLE**

Operations Manager

**TELEPHONE**

(208) 939-6831

**6. EXACT PLANT LOCATION**

Portable

**COUNTY**

Ada

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

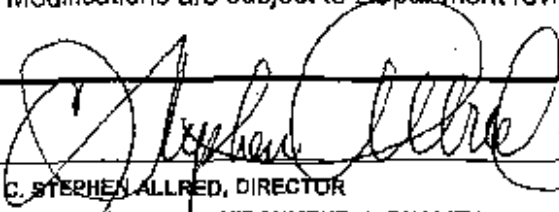
Production of ready-mix concrete

**8. PERMIT AUTHORITY**

This permit is issued according to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.400-470 and IDAPA 58.01.01.200-228. This permit pertains only to emissions of air contaminants, which are regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit. Only the terms and conditions pertaining to Tier II operating permit requirements are subject to the expiration date of this permit.

This permit is not transferable to another person, place, or piece or set of equipment. This permit will expire if construction has not yet 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 in the application and the Idaho Department of Environmental Quality's technical analysis of the supplied information. Changes in design or equipment that result in any change in the nature or amount of emissions may be considered a modification. Modifications are subject to Department review in accordance with IDAPA 58.01.01.200 et seq.

  
C. STEPHEN ALLRED, DIRECTOR  
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: July 8, 2003

~~DATE EXPIRES: July 8, 2005~~

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## ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

|                  |                                                                                                                                      |
|------------------|--------------------------------------------------------------------------------------------------------------------------------------|
| AIRS             | Aerometric Information Retrieval System                                                                                              |
| Department       | Department of Environmental Quality                                                                                                  |
| EPA              | U.S. Environmental Protection Agency                                                                                                 |
| IDAPA            | a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act |
| km               | kilometer                                                                                                                            |
| lb/hr            | pounds per hour                                                                                                                      |
| O&M              | Operations and Maintenance                                                                                                           |
| PM               | particulate matter                                                                                                                   |
| PM <sub>10</sub> | particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers                                       |
| PTC              | permit to construct                                                                                                                  |
| SIC              | Standard Industrial Classification                                                                                                   |
| SM               | synthetic minor                                                                                                                      |
| T/yr             | tons per year                                                                                                                        |
| UTM              | Universal Transverse Mercator                                                                                                        |

# AIR QUALITY TIER II OPERATING AND PERMIT TO CONSTRUCT NUMBER: T2-020033

|            |                    |                             |                          |                         |
|------------|--------------------|-----------------------------|--------------------------|-------------------------|
| Permittee: | Idaho Concrete Co. | AIRS Facility No. 777-00151 | Date Issued:             | July 8, 2003            |
| Location:  | Portable           |                             | <del>Date Expires:</del> | <del>July 8, 2008</del> |

## 1 ~~PERMIT SCOPE~~

### Purpose

1.1 ~~The purpose of this permit is to limit PM<sub>10</sub> emissions from this facility as part of the Northern Ada County PM<sub>10</sub> Maintenance Plan.~~

1.2 ~~This Tier II operating permit and permit to construct incorporates the following permit:~~

~~PTC No. 777-00454, issued August 2, 2000~~

### Regulated Sources

1.3 ~~Table 1.1 lists all sources of emissions that are regulated in this permit.~~

~~Table 1.1 EMISSIONS SOURCES~~

| <del>Permit Section</del> | <del>Source Description</del>                                                                                                                                                      | <del>Emissions Control(s)</del> |
|---------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|
| <del>2</del>              | <del>Cement storage silo</del>                                                                                                                                                     | <del>Baghouse</del>             |
| <del>4</del>              | <del>All associated fugitive emissions from the following: sand and aggregate transfers, weigh hopper loading, truck mixing, vehicle traffic, and wind erosion of stockpiles</del> | <del>Reasonable control</del>   |



# AIR QUALITY TIER II OPERATING AND PERMIT TO CONSTRUCT NUMBER: T2-020033

|            |                    |                             |               |              |
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| Location:  | Portable           |                             | Date Expires: | July 8, 2008 |

## 2. FACILITY-WIDE CONDITIONS

The following table contains a summary of requirements that apply generally to emissions units at the facility:

**Table 2.1 SUMMARY OF REQUIREMENTS**

| Permit Condition | Parameter                          | Permit Limit/Standard Summary                                                 | Applicable Requirements Reference | Monitoring & Recordkeeping Requirements |
|------------------|------------------------------------|-------------------------------------------------------------------------------|-----------------------------------|-----------------------------------------|
| <del>2.4</del>   | <del>Fugitive dust</del>           | <del>Reasonable control</del>                                                 | <del>IDAPA 58.01.01.650-651</del> | <del>2.2, 2.3, 2.4, 2.5, 2.10</del>     |
| <del>2.6</del>   | <del>Odors</del>                   | <del>Reasonable control</del>                                                 | <del>IDAPA 58.01.01.775-776</del> | <del>2.7, 2.10</del>                    |
| <del>2.9</del>   | <del>Visible emissions</del>       | <del>90% opacity for no more than three minutes in any 60-minute period</del> | <del>IDAPA 58.01.01.625</del>     | <del>2.3, 2.10</del>                    |
| <del>2.10</del>  | <del>Excess emissions</del>        | <del>Compliance with IDAPA 58.01.01.100-100</del>                             | <del>IDAPA 58.01.01.100-100</del> | <del>2.10</del>                         |
| <del>2.12</del>  | <del>Air stagnation advisory</del> | <del>Compliance with IDAPA 58.01.01.550-552</del>                             | <del>IDAPA 58.01.01.550-552</del> | <del>2.10</del>                         |
| <del>2.11</del>  | <del>Open burning</del>            | <del>In accordance with IDAPA 58.01.01.600-616</del>                          | <del>IDAPA 58.01.01.600-616</del> | <del>2.10</del>                         |

### Fugitive Dust

~~2.1 All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651. 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 PM. Some of the reasonable precautions include, but are not limited to, the following:~~

- ~~• 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.~~
- ~~• 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.~~
- ~~• 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.~~
- ~~• Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts.~~
- ~~• Paving of roadways and their maintenance in a clean condition, where practical.~~
- ~~• Prompt removal of earth or other stored material from streets, where practical.~~

# AIR QUALITY TIER II OPERATING AND PERMIT TO CONSTRUCT NUMBER: T2-020033

|            |                    |                             |                          |                         |
|------------|--------------------|-----------------------------|--------------------------|-------------------------|
| Permittee: | Idaho Concrete Co. | AIRS Facility No. 777-00151 | Date Issued:             | July 8, 2003            |
| Location:  | Portable           |                             | <del>Date Expires:</del> | <del>July 8, 2009</del> |

- ~~2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.~~
- ~~2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.~~
- ~~2.4 The permittee shall conduct a weekly facility wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions, to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each weekly fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.~~
- 2.5 Visible emissions are a trigger that requires the initiation of a strategy or strategies to control fugitive dust emission from associated processes of a concrete batch plant such as weigh hopper, sand and aggregate transfer, truck mixing, paved and unpaved roads, and stockpiles. Emissions from any of the associated processes and roads shall not exceed 20% opacity for a period or periods aggregating more than one minute in any 60-minute period. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

## Odors

- ~~2.6 No person shall allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.~~
- ~~2.7 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.~~

## Visible Emissions

- ~~2.8 The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gas are the only reason(s) for the failure of the emission to comply with the requirements of this section.~~
- ~~2.9 The permittee shall conduct a weekly facility wide inspection of potential sources of visible emissions during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see evaluation for each potential source. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee~~

**AIR QUALITY TIER II OPERATING AND PERMIT TO CONSTRUCT NUMBER: T2-020033**

|            |                    |                             |               |              |
|------------|--------------------|-----------------------------|---------------|--------------|
| Permittee: | Idaho Concrete Co. | AIRS Facility No. 777-00151 | Date Issued:  | July 8, 2003 |
| Location:  | Portable           |                             | Date Expires: | July 8, 2008 |

~~shall take all necessary corrective action and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each weekly visible emissions inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.~~

**~~Excess Emissions~~**

~~2.10 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets, and breakdowns.~~

**~~Reports and Certifications~~**

~~2.11 Any reporting required by this permit, 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. Any reporting required by this permit shall be submitted to the following:~~

~~Air Quality Permit Compliance  
Department of Environmental Quality  
Boise Regional Office  
1445 N. Orchard  
Boise, ID 83706~~

**~~Air Stagnation Advisory Days~~**

~~2.12 The permittee shall comply with the Air Pollution Emergency Rules in IDAPA 58.01.01.550-582.~~

**~~Monitoring and Recordkeeping~~**

2.13 The permittee shall maintain sufficient recordkeeping to ensure compliance with all the terms and conditions of this operating permit. Records of monitoring information shall include, but not limited to the following: (a) the date, place, and times of sampling or measurement; (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 measurements. 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 Department representatives upon request.

**AIR QUALITY TIER II OPERATING AND PERMIT TO CONSTRUCT NUMBER: T2-020033**

|                   |                    |                                    |                      |              |
|-------------------|--------------------|------------------------------------|----------------------|--------------|
| <b>Permittee:</b> | Idaho Concrete Co. | <b>AIRS Facility No.</b> 777-00151 | <b>Date Issued:</b>  | July 8, 2003 |
| <b>Location:</b>  | Portable           |                                    | <b>Date Expires:</b> | July 8, 2006 |

**Open Burning**

~~2.14 The permittee shall comply with the requirements of IDAPA 58.01.01.600-616, Rules for Control of Open Burning.~~

**Obligation to Comply**

~~2.15 Receiving a Tier II operating permit shall not relieve any owner or operator of the responsibility to comply with all applicable local, state, and federal rules and regulations.~~

**Relocation**

~~2.16 At least 10 days prior to relocating any equipment covered by this permit, the permittee shall register all existing portable equipment using the Department's Portable Equipment Registration and Relocation Form (PERF) available on the Department's Website at: [www.state.id.us/daq/air/equip relocat.htm](http://www.state.id.us/daq/air/equip relocat.htm). Each PERF, along with a scaled plot plan of the relocation site, shall be mailed to the following address:~~

~~PERF Processing Unit  
Idaho DEQ - Air Quality  
4440 N. Hilitee  
Boise, ID 83706-4956~~

**AIR QUALITY TIER II OPERATING AND PERMIT TO CONSTRUCT NUMBER: T2-020033**

|                   |                    |                                    |                      |              |
|-------------------|--------------------|------------------------------------|----------------------|--------------|
| <b>Permittee:</b> | Idaho Concrete Co. | <b>AIRS Facility No.</b> 777-00151 | <b>Date Issued:</b>  | July 8, 2003 |
| <b>Location:</b>  | Portable           |                                    | <b>Date Expires:</b> | July 8, 2008 |

### 3. CEMENT STORAGE SILO

#### ~~2.1 Process Description~~

~~The purpose for the cement storage silo is to store cement for use in the production of concrete.~~

#### ~~2.2 Control Description~~

~~Particulate matter emissions from the pneumatic loading of cement from a delivery truck to the cement storage silo are controlled by a baghouse.~~

#### ~~Emissions Limits~~

#### 3.3 Emissions Limits

Emissions of PM<sub>10</sub> from cement silo loading shall not exceed any corresponding emissions rate limits listed in the appendix of this permit.

[PTC No. 777-00151, 8/3/00]

#### ~~Operating Requirements~~

#### 3.4 Throughput Limits

The maximum annual production of concrete shall not exceed 500,000 cubic yards per any consecutive 12-month period.

#### ~~2.5 Operations and Maintenance Manual Requirements~~

~~Within 60 days after startup, the permittee shall have developed an O&M manual for the cement storage silo baghouse describing the procedures that shall be followed to comply with General Provision 5.2 and the baghouse pressure drop requirements contained in this permit. The manual shall remain onsite at all times and shall be made available to Department representatives upon request.~~

#### 3.6 Monitoring Equipment

The permittee shall install, calibrate, maintain, and operate, in accordance with manufacturer specifications, a pressure drop monitoring device to measure the pressure differential across the cement storage silo baghouse.

#### 3.7 Pressure Drop Across Air Pollution Control Device

The pressure drop across the cement storage silo baghouse shall be maintained within manufacturer and O&M manual specifications. Documentation of both manufacturer and O&M manual operating pressure drop specifications shall remain onsite at all times and shall be made available to Department representatives upon request.

**AIR QUALITY TIER II OPERATING AND PERMIT TO CONSTRUCT NUMBER: T2-020033**

|                   |                    |                                    |                      |              |
|-------------------|--------------------|------------------------------------|----------------------|--------------|
| <b>Permittee:</b> | Idaho Concrete Co. | <b>AIRS Facility No. 777-00151</b> | <b>Date Issued:</b>  | July 8, 2003 |
| <b>Location:</b>  | Portable           |                                    | <b>Date Expires:</b> | July 8, 2008 |

**Monitoring and Recordkeeping Requirements****3.8 Operating Parameters**

The permittee shall monitor and record the following information:

- Pressure drop reading across the cement storage silo baghouse once each time the cement storage silo is loaded.
- Concrete production in cubic yards per month and cubic yards per year. Monthly concrete production shall be summed over the previous consecutive 12-month period to demonstrate compliance with Permit Condition 3.4.

These records shall be maintained in accordance with Permit Condition 2.13.

~~(BTC No. 777-00151, 8/3/03)~~

**AIR QUALITY TIER II OPERATING AND PERMIT TO CONSTRUCT NUMBER: T2-020033**

|                   |                    |                                    |                      |              |
|-------------------|--------------------|------------------------------------|----------------------|--------------|
| <b>Permittee:</b> | Idaho Concrete Co. | <b>AIRS Facility No. 777-00151</b> | <b>Date Issued:</b>  | July 8, 2003 |
| <b>Location:</b>  | Portable           |                                    | <b>Date Expires:</b> | July 8, 2008 |

**4. APPENDIX**

**Table 4.1 EMISSION LIMITS**

| Idaho Concrete Co.<br>Emission Limits <sup>a</sup> - Hourly (lb/hr), and Annual <sup>b</sup> (T/yr) |                                                              |                                                             |
|-----------------------------------------------------------------------------------------------------|--------------------------------------------------------------|-------------------------------------------------------------|
| Source Description                                                                                  | Hourly PM <sub>10</sub> <sup>c</sup><br>Emissions<br>(lb/hr) | Annual PM <sub>10</sub> <sup>c</sup><br>Emissions<br>(T/yr) |
| Cement storage silo                                                                                 | 3.7                                                          | 0.6                                                         |
| All associated process emissions (fugitives included)                                               |                                                              | 19.4                                                        |

<sup>a</sup> As determined by a pollutant-specific EPA reference method, a Department-approved alternative, or as determined by the Department's emissions estimation methods used in this permit analysis.

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

<sup>c</sup> Includes condensibles.

**AIR QUALITY TIER II OPERATING AND PERMIT TO CONSTRUCT NUMBER: T2-020033**

|                   |                    |                                    |                      |              |
|-------------------|--------------------|------------------------------------|----------------------|--------------|
| <b>Permittee:</b> | Idaho Concrete Co. | <b>AIRS Facility No.</b> 777-00151 | <b>Date Issued:</b>  | July 8, 2003 |
| <b>Location:</b>  | Portable           |                                    | <b>Date Expires:</b> | July 8, 2008 |

**5. GENERAL PROVISIONS**

- 5.1 All emissions authorized herein shall be consistent with the terms and conditions of this permit. 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.
- 5.2 The permittee shall at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintain and operate in good working order all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
- 5.3 The permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
- To enter upon the permittee's 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; and
  - 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 to require stack emissions testing (i.e., performance tests) in conformance with state-approved or accepted EPA procedures when deemed appropriate by the Director.
- 5.4 Except for data determined to be confidential under Section 9-342A *Idaho Code*, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Department of Environmental Quality.
- 5.5 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.
- 5.6 In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter; a copy of which shall be forwarded to the Director.
- 5.7 This permit shall be renewable on the expiration date, provided the permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within 60 days after receipt of the Director's request shall cause the permit to become void.
- 5.8 The Director may require the permittee to develop a list of operation and maintenance procedures to be approved by the Department. Such list of procedures shall become a part of this permit by reference, and the permittee shall adhere to all of the operation and maintenance procedures contained therein.
- 5.9 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.





**Air Quality**  
**TIER II OPERATING PERMIT**  
State of Idaho  
Department of Environmental Quality

PERMIT NO.: 027-00010

AQCR: 064

CLASS: A

SIC: 2063

ZONE: 11

UTM COORDINATE (km): 534.5, 4828.0

**1. PERMITTEE**

The Amalgamated Sugar Company LLC

**2. PROJECT**

Tier II Operating Permit

**3. MAILING ADDRESS**

P.O. Box 8787

**CITY**

Nampa

**STATE**

ID

**ZIP**

83653-8787

**4. FACILITY CONTACT**

Joe Huff

**TITLE**

Nampa Plant Manager

**TELEPHONE**

(208) 466-3541

**5. RESPONSIBLE OFFICIAL**

Joe Huff

**TITLE**

Nampa Plant Manager

**TELEPHONE**

(208) 466-3541

**6. EXACT PLANT LOCATION**

138 W. Karcher Road, Nampa, Idaho

**COUNTY**

Canyon

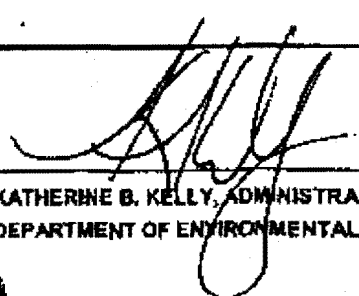
**7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**

Beet Sugar Manufacturing

**8. PERMIT AUTHORITY**

This permit is issued according to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.400, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit.

This permit has been granted on the basis of design information presented in the application and the Idaho Department of Environmental Quality's technical analysis of the supplied information. Changes in design or equipment that result in any change in the nature or amount of emissions may be considered a modification. Modifications are subject to Department review in accordance with IDAPA 58.01.01.200 of the *Rules for the Control of Air Pollution in Idaho*.

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

DATE ISSUED: September 30, 2002

DATE EXPIRES: September 30, 2007

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## ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

|                  |                                                                                                                                      |
|------------------|--------------------------------------------------------------------------------------------------------------------------------------|
| AQCR             | Air Quality Control Region                                                                                                           |
| CFR              | Code of Federal Regulations                                                                                                          |
| CO               | carbon monoxide                                                                                                                      |
| CSB              | concentrated separator byproducts                                                                                                    |
| Department       | Department of Environmental Quality                                                                                                  |
| EPA              | U.S. Environmental Protection Agency                                                                                                 |
| gr/dscf          | grains per dry standard cubic foot                                                                                                   |
| 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                                                                                                                       |
| MMscf            | million standard cubic feet                                                                                                          |
| MMscf/hr         | million standard cubic feet per year                                                                                                 |
| NAAQS            | National Ambient Air Quality Standards                                                                                               |
| NO <sub>x</sub>  | nitrogen oxides                                                                                                                      |
| NSPS             | New Source Performance Standards                                                                                                     |
| O&M              | operations and maintenance                                                                                                           |
| PM               | particulate matter                                                                                                                   |
| PM <sub>10</sub> | particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers                                       |
| PTC              | permit to construct                                                                                                                  |
| SIC              | Standard Industrial Classification                                                                                                   |
| SIP              | State Implementation Plan                                                                                                            |
| SO <sub>2</sub>  | sulfur dioxide                                                                                                                       |
| TASCO            | The Amalgamated Sugar Co. LLC                                                                                                        |
| TDS              | total dissolved solids                                                                                                               |
| TEOM             | Tapered Element Oscillating Microbalance Ambient Air Monitor                                                                         |
| T/d, T/hr, T/yr  | tons per day, tons per hour, and tons per year, respectively                                                                         |
| UTM              | Universal Transverse Mercator                                                                                                        |
| VOC              | volatile organic compound                                                                                                            |

# AIR QUALITY TIER II OPERATING PERMIT NUMBER: 027-00010

Permittee: The Amalgamated Sugar Co. LLC  
Location: Nampa, Idaho

Date Issued: September 30, 2002  
Date Expires: September 30, 2007

## 1. ~~TIER II OPERATING PERMIT SCOPE~~

### ~~Purpose~~

~~1.1 In accordance with IDAPA 58.01.01.403.02, this Tier II operating permit establishes facility-wide requirements necessary to ensure that air emissions from the TASCO facility do not cause or significantly contribute to a violation of the NAAQS. The Tier II project was originally initiated to establish enforceable emissions limits in support of the Northern Ada County PM<sub>10</sub> SIP control strategy.~~

~~1.2 This Tier II operating permit incorporates all applicable permit terms from the following permits:~~

- ~~• Air Pollution Source Permit No. 13-0400-0010, dated March 19, 1981~~
- ~~• Air Pollution Source Permit No. 0400-0010, dated January 1, 1984~~

### ~~Regulated Sources~~

~~1.3 Table 1.1 below lists sources of emissions that are specifically regulated in this Tier II operating permit.~~

**Table 1.1: SUMMARY OF REGULATED SOURCES**

| Permit<br>Sections | Source Description                                      | Emissions Control(s)                                                                       |
|--------------------|---------------------------------------------------------|--------------------------------------------------------------------------------------------|
| 2                  | Fugitive Dust Sources                                   | Fugitive Dust Plan                                                                         |
| 3                  | Three coal/natural gas-fired boilers (S-B1, S-B2, S-B3) | Baghouse A-B4/2 and A-B5                                                                   |
| 4                  | One natural gas-fired boiler (S-B4)                     | None                                                                                       |
| 5                  | Three pulp dryers (S-D1, S-D2, S-D3)                    | Cyclones A-D4A, A-D2A, A-D3A;<br>Scrubbers A-D1B, A-D2B, A-D3A                             |
| 6                  | Five pellet mills (S-D4, S-D5, S-D6, S-D7, S-D8)        | Cyclones A-D4, A-D5, A-D6,<br>A-D7, A-D8; Baghouse <sup>a</sup>                            |
| 7                  | Two lime kilns (S-K1, S-K2)                             | 80%: Gas washers A-K1A, A-K2A;<br>Carbonation systems A-K1B, A-K2B<br>40%: Baghouse A-K1/2 |
| 8                  | Two process slakers (S-K4)                              | Scrubber A-K4                                                                              |
| 9                  | One drying granulator (S-W1)                            | Scrubber A-W1                                                                              |
| 10                 | Two cooling granulators (S-W2, S-W3)                    | Scrubbers A-W2, A-W3                                                                       |
| 11                 | Three sugar handling systems (S-W4, S-W5, S-W6)         | Baghouses A-W4, A-W5, A-W6                                                                 |
| 12                 | Lime kiln building (S-K3)                               | Lime kiln building; Baghouse A-K8                                                          |

<sup>a</sup> The pellet mill baghouse will be installed within one year of issuance of the Tier II operating permit refer to Permit Condition 13.

**AIR QUALITY TIER II OPERATING PERMIT NUMBER: 027-00010**

**Permittee:** The Amalgamated Sugar Co. LLC

**Date Issued:** September 30, 2002

**Location:** Nampa, Idaho

**Date Expires:** September 30, 2007

## 2. FACILITY-WIDE CONDITIONS

Table 2.1 below contains a summary of requirements that apply generally to emissions units at the facility.

**Table 2.1: SUMMARY OF FACILITY-WIDE REQUIREMENTS**

| Permit Conditions | Parameter                            | Permit Limit/Standard Summary                                                               | Applicable Requirements Reference | Monitoring and Recordkeeping Requirements |
|-------------------|--------------------------------------|---------------------------------------------------------------------------------------------|-----------------------------------|-------------------------------------------|
| 2.1, 2.2          | Fugitives                            | Reasonable control of fugitive dust; Fugitive Dust Management Plan                          | IDAPA 58.01.01.650-651            | 2.2, 2.3, 2.4                             |
| 2.5               | PM <sub>10</sub> and SO <sub>2</sub> | Ambient monitoring requirements; No source or significant contribution to a NAAQS violation | IDAPA 58.01.01.493-02             | 2.5.1 - 2.5.5                             |
| 2.6-2.7           | Criteria pollutants                  | Performance testing requirements                                                            | IDAPA 58.01.01.406-02             | 2.6 - 2.14                                |

### ***Fugitive Emissions Requirements***

**2.1** All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651. 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 PM. Some of the reasonable precautions include, but are not limited to, the following:

- 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.
- Application, where practical, of asphalt, water, or suitable chemicals to, or covering of dirt roads, material stockpiles, and other surfaces which can create dust.
- 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.
- Covering, where practical, of open bodied trucks transporting materials likely to give rise to airborne dusts.
- Paving of roadways and their maintenance in a clean condition, where practical.
- Prompt removal of earth or other stored material from streets, where practical.

[IDAPA 58.01.01.650-651, 5/1/84]

**2.2** Within 60 days of the issuance of the Tier II operating permit, the permittee shall implement the following Fugitive Dust Management Plan to control fugitive emissions. The permittee shall monitor and maintain weekly records of any and all actions taken to comply with the measures, including, but not limited to, frequency of application or observation, type and quantity of suppressant applied, the extent and date(s) of any deviation from any provision of Facility-wide Condition 2.2, and corrective actions implemented to correct any deviation(s).

**AIR QUALITY TIER II OPERATING PERMIT NUMBER: 027-00010**

**Permittee:** The Amalgamated Sugar Co. LLC  
**Location:** Nampa, Idaho

**Date Issued:** September 30, 2002  
**Date Expires:** September 30, 2007

- Operate atomizing sprays at the coal unloading station (Emissions Unit No. F-04) during any material moving activities at the unloading station.
- Install and operate fugitive dust spray bar systems on all rolling stock, with the exception of the coal rolling packer and temporary rental equipment, associated with operations in the vicinity of the coal storage area.
- Inspect and maintain the burn and loss at the eastern boundary of the facility as necessary, but not less than annually.
- Apply water or a water/CSB dust suppressant to all facility roads, coal and coke haul roads, and beet unloading areas as necessary, but not less than weekly from May 1 through October 31 of each year.
- Apply water to the coal pile, at least biweekly during unloading and transfer activities.
- Apply a surfactant to the coal pile, at least once per year after the coal storage area has reached final grade.

[IDAPA 58.01.01.405.01, 5/4/04]

- 2.3 The permittee shall maintain and record all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

[IDAPA 58.01.01.405.01, 5/4/04]

- 2.4 Unless specified elsewhere in this permit, the permittee shall conduct a monthly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each monthly fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

[IDAPA 58.01.01.405.01, 5/4/04]

### **Ambient Monitoring Requirements**

- 2.5 Within 12 months of Tier II operating permit issuance, the permittee shall install, maintain, and operate two reference PM<sub>10</sub> (one TEOM and one high volume), one reference SO<sub>2</sub>, and meteorological monitoring equipment at a location(s) approved by the Department. Ambient air quality monitoring shall be performed to collect data on meteorological parameters and ambient concentrations of PM<sub>10</sub> and SO<sub>2</sub>, as follows:

- 2.5.1 The permittee shall submit an ambient monitoring protocol to the Department for approval within 120 days of Tier II operating permit issuance. The protocol shall provide the specifications on the monitoring equipment and define the operating parameters for conducting the monitoring. The protocol when approved shall become part of the terms and conditions of the Tier II operating permit.

**AIR QUALITY TIER II OPERATING PERMIT NUMBER: 027-00010**

**Permittee:** The Amalgamated Sugar Co. LLC  
**Location:** Nampa, Idaho

**Date Issued:** September 30, 2002  
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~~2.5.1 The ambient air monitoring site location(s) shall be selected through modeling analysis. The permittee shall submit a modeling analysis protocol to the Department for approval within 60 days of Tier II operating permit issuance. The permittee shall conduct and submit the modeling analysis for placing the monitors, with all backup data requested by the Department, for approval within 60 days after the modeling protocol is approved.~~

~~2.5.2 The permittee shall make the PM<sub>10</sub>, TSP, and SO<sub>2</sub> monitoring station(s) data accessible to the Department on a real time basis via telemetry. All monitoring data shall also be submitted to the Department in accordance with the ambient monitoring protocol approved by the Department. The data shall be subject to Department quality assurance review. The Department may make all valid ambient air quality data available to the public.~~

~~2.5.4 The permittee may discontinue maintenance and operation of the SO<sub>2</sub> ambient air quality monitor at any time after all of the requirements of Permit Condition 19.4 have been satisfied.~~

~~2.5.5 The permittee may discontinue maintenance and operation of the PM<sub>10</sub> ambient air quality monitors at any time after all of the requirements of Permit Condition 19.8 have been satisfied.~~

~~(IDAPA 58.01.01.405.02, 5.17.04, IDAPA 58.01.01.405.01(c), 5.17.04)~~

**Performance Testing Requirements**

~~2.6 For all required performance testing, the permittee shall provide notice of intent to test to the Department at least 45 days prior to the scheduled test or shorter time period as provided in a permit, order, consent decree, or by Department approval. The Department may, at its option, have an observer present at any emissions tests conducted on a source. The Department requests such testing not be performed on weekends or state holidays.~~

~~All testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior Department approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by the Department for any testing deviations, the Department may determine that the testing does not satisfy the testing requirements. Therefore, prior to conducting any compliance test, the permittee is strongly encouraged to submit in writing to the Department, at least 60 days in advance, the following for approval:~~

- ~~1. The type of method to be used~~
- ~~2. Any extenuating or unusual circumstances regarding the proposed test~~
- ~~3. The proposed schedule for conducting and reporting the test~~

~~Within 90 days following the date on which a compliance test required by this permit is concluded, the permittee shall submit to the Department a compliance test report for the respective test. The compliance test report shall include a description of the process, identification of the method used or 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.~~

~~The proposed test date(s), test date rescheduling notice(s), compliance test report, and all other correspondence shall be sent to the following:~~

**AIR QUALITY TIER II OPERATING PERMIT NUMBER: 027-00010**

Permittee: The Amalgamated Sugar Co. LLC  
Location: Nampa, Idaho

Date Issued: September 30, 2002  
~~Date Expires: September 30, 2007~~

~~Air Quality Permit Compliance  
Department of Environmental Quality  
 Boise Regional Office  
1445 N. Orchard  
Boise, ID 83706-2200  
Telephone: (208) 373-0550 Fax: (208) 373-0397~~

~~IDAPA 58.01.01.157, 4/5/00; IDAPA 58.01.01.105.02, 5/1/04~~

- 2.7 For all required performance testing, the permittee shall use the test methods described in Table 2.2 to measure the pollutant emissions.

Table 2.2: APPROVED TEST METHODS

| Pollutant                 | Test Method <sup>a</sup>         | Special Conditions                                                                                                  |
|---------------------------|----------------------------------|---------------------------------------------------------------------------------------------------------------------|
| PM <sub>10</sub>          | EPA Method 201.a. and Method 202 |                                                                                                                     |
| <del>PM</del>             | <del>EPA Method 5</del>          |                                                                                                                     |
| <del>NO<sub>x</sub></del> | <del>EPA Method 7</del>          |                                                                                                                     |
| <del>SO<sub>2</sub></del> | <del>EPA Method 9</del>          |                                                                                                                     |
| <del>CO</del>             | <del>EPA Method 40</del>         |                                                                                                                     |
| <del>VOC</del>            | <del>EPA Method 80</del>         |                                                                                                                     |
| <del>Opacity</del>        | <del>EPA Method 9</del>          | <del>For an HOPS source, use IDAPA 58.01.01.020 and Method 9. For other sources, use IDAPA 58.01.01.020 only.</del> |

<sup>a</sup> Or Department-approved alternative in accordance with IDAPA 58.01.01.157

~~[IDAPA 58.01.01.157.02, 4/5/00]~~

- ~~2.8 For all required performance testing, the permittee shall address the required averaging period specified in accordance with IDAPA 58.01.01.670 and the altitude correction in IDAPA 58.01.01.680 prior to conducting the test.~~

~~[IDAPA 58.01.01.105.02, 5/1/04]~~

- ~~2.9 For all required performance testing, a visible emissions evaluation shall be performed during each test. The visible emissions evaluation shall be conducted in accordance with the procedures contained in IDAPA 58.01.01.625.~~

~~[IDAPA 58.01.01.105.02, 5/1/04]~~

**~~Performance Testing Schedule~~**

- 2.10 Within 120 days of issuance of the Tier II operating permit and before the end of the 2002/2003 beet campaign, the permittee shall conduct performance tests as required in Facility-wide Condition 2.10.1.
- 2.10.1 Performance tests shall be conducted on the South, Center and North dryers to demonstrate compliance with the emissions limits for PM<sub>10</sub> in Permit Condition 13.2. The dryer shall be tested with coal as the exclusive fuel. The permittee shall monitor and record the throughput of the dryer, coal feed rate in tons per hour, and scrubber differential pressure of the scrubbers during each test. Throughput of the dryer shall be represented by the sum of the masses of coal, wet pulp, and CSB fed to the dryer. The permittee shall collect a representative sample of recirculated water from the scrubber during each test. The concentration of TDS in the sample water shall be analyzed, recorded, and expressed in milligrams of solids per liter of water.



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**Date Expires:** September 30, 2007

2.10.2 If the PM<sub>10</sub> emissions rate measured in the performance test conducted in accordance with Facility-wide Condition 2.10.1 is less than or equal to 75% of the PM<sub>10</sub> emissions standard in Facility-wide Condition 13.2, no further testing shall be required. If the PM<sub>10</sub> emissions rate measured during the performance test conducted in accordance with Facility-wide Condition 2.10.1 is greater than 75%, but less than or equal to 90% of the PM<sub>10</sub> emissions standard in Facility-wide Condition 13.2, a second test shall be required in the third year of the permit term. If the PM<sub>10</sub> emissions rate measured during the performance test conducted in accordance with Facility-wide Condition 2.10.1 is greater than 90% of the PM<sub>10</sub> emissions standard in Facility-wide Condition 13.2, the permittee shall conduct a compliance test annually.

**NDAPA-59.01.01-105.02-541/04**

2.11 The permittee shall conduct performance tests as required in Facility-wide Conditions 2.11.1 through 2.11.5 during the first beet campaign following fulfillment of the provisions of Permit Condition 13.4.

2.11.1 Performance tests shall be conducted on the B&W No. 1 boiler, the B&W No. 2 boiler, and the Riley boiler to demonstrate compliance with the emissions limits for PM<sub>10</sub> and CO in Permit Condition 3.3. The performance test shall be conducted after the requirements of Permit Condition 13.4.2 have been satisfied. For the PM<sub>10</sub> performance test, the boilers shall be tested with coal as the exclusive fuel. For the CO performance test, the boilers shall be tested with natural gas as the exclusive fuel. The permittee shall monitor and record the steam production rate of each boiler; coal feed rate to each boiler in tons per hour or natural gas firing rate in MMscf/hr; the highest heating value and analysis results, including ash content, for the performance test with coal; and pressure drop across each baghouse during each test.

2.11.2 Performance tests shall be conducted on the B&W No. 1, B&W No. 2, and Riley boilers to demonstrate compliance with the emissions limit for PM in Permit Condition 3.4. The performance test shall be conducted after the requirements of Permit Condition 13.4.2 have been satisfied. The tests shall be conducted with coal as the exclusive fuel in the boilers. The permittee shall monitor and record the steam production rate of each boiler; coal feed rate to each boiler in tons per hour; the highest heating value and analysis results, including ash content, for the coal; and pressure drop across the baghouse during each test.

2.11.3 Performance tests shall be conducted on the pellet mills to demonstrate compliance with the emissions limits for PM<sub>10</sub> in Permit Condition 6.3. The performance test shall be conducted after the requirements of Permit Condition 6.6 have been satisfied. The permittee shall monitor and record total throughput of the mills and the pressure drop across the baghouse during each test. Total throughput of the mills will be determined by the dry shred weight-o-meter.

2.11.4 Performance tests shall be conducted on the lime kilns to demonstrate compliance with the emissions limits for PM<sub>10</sub> and CO in Permit Condition 7.3. The permittee shall monitor and record the lime rock throughput of each kiln and the pressure drop across the baghouse during each test.

2.11.5 If an emissions rate measured in the initial performance test conducted pursuant to Permit Condition 2.11.1 is less than or equal to 75% of an applicable emissions standard in Permit Condition 3.3, no further testing shall be required. If an emissions rate measured during the performance test conducted pursuant to Permit Condition 2.11.1 is greater than 75%, but less than or equal to 90% of an applicable emissions standard in Permit Condition 3.3, a second test shall be required in the third year of the permit term. If an emissions rate measured during the performance test conducted pursuant to Permit Condition 2.11.1 is greater than 90% of an applicable emissions standard in Permit Conditions 3.3, the permittee shall conduct a performance test annually.

**NDAPA-59.01.01-105.02-541/04**

**AIR QUALITY TIER II OPERATING PERMIT NUMBER: 027-00010**

**Permittee:** The Amalgamated Sugar Co. LLC  
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2.12 The permittee shall conduct performance tests as required in Facility-wide Conditions 2.12.1 through 2.12.3 during the second beet campaign following fulfillment of the provisions of Permit Condition 13.4.

2.12.1 Performance tests shall be conducted on the Union boiler to demonstrate compliance with the emissions limits for PM<sub>10</sub> and CO in Permit Condition 4.3. The permittee shall monitor and record the steam production rate of the boiler and the natural gas-firing rate of the boiler during each test.

2.12.2 Performance tests shall be conducted on the process slakers to demonstrate compliance with the emissions limits for PM<sub>10</sub> in Permit Condition 8.3 and the emissions limit for PM in Permit Condition 8.4. The permittee shall monitor and record the calcium oxide rock throughput of each process slaker and the scrubber nozzle header pressure during each test.

2.12.3 Performance tests shall be conducted on the drying granulator to demonstrate compliance with the emissions limits for PM<sub>10</sub> in Permit Condition 9.3 and the emissions limits for PM in Permit Condition 9.4. The permittee shall monitor and record the throughput of the drying granulator and the brix of the scrubber fluid during each test.

~~(BADA-58-04-04-105-02, 5/4/04)~~

2.13 The permittee shall conduct performance tests as required in Facility-wide Conditions 2.13.1 through 2.13.3 during the third beet campaign following fulfillment of the provisions of Permit Condition 13.4.

2.13.1 Performance tests shall be conducted on the No. 1 cooling granulator to demonstrate compliance with the emissions limits for PM<sub>10</sub> in Permit Condition 10.3. The permittee shall monitor and record the throughput of the granulator and the pressure drop across the baghouse during each test.

2.13.2 Performance tests shall be conducted on the process No. 2, specialties, and packaging-line sugar handling systems to demonstrate compliance with the emissions limits for PM<sub>10</sub> in Permit Condition 11.3 and the applicable emissions limit for PM in Permit Conditions 11.4 or 11.5. The permittee shall monitor and record the throughput of the sugar handling system and the pressure drop across the baghouse during each test.

2.13.3 Performance tests shall be conducted on the lime kiln building baghouse during the third year of the permit term to demonstrate compliance with the emissions limit for PM<sub>10</sub> in Permit Condition 12.3. The permittee shall monitor and record the total throughput of lime rock to the kilns and the pressure drop across the lime kiln building baghouse during each test.

~~(BADA-58-04-04-105-02, 5/4/04)~~

2.14 The permittee shall conduct performance tests as required in Facility-wide Conditions 2.14.1 through 2.14.2 during the first beet campaign following fulfillment of the provisions of Permit Condition 13.8.

2.14.1 Performance tests shall be conducted on the South dryer to demonstrate compliance with the emissions limits for PM<sub>10</sub> and CO in Permit Condition 5.3. For the PM<sub>10</sub> performance test, the dryer shall be tested with coal as the exclusive fuel. For the CO performance test, the dryer shall be tested with natural gas as the exclusive fuel. The performance test shall be conducted after the requirements of Permit Condition 13.8 have been satisfied. The permittee shall monitor and record the tons of wet pulp and CSB fed to the dryer, coal feed rate in tons per hour or natural gas-firing rate in MMscf/hr, and scrubber differential pressure of the scrubbers during each test. The permittee shall collect a representative sample of recirculated water from the scrubber during each test. The concentration of TDS in the sample water shall be analyzed, recorded, and expressed in milligrams of solids per liter of water.

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2.14.2 Performance tests shall be conducted on the South dryer to demonstrate compliance with the emissions limit for PM in Permit Condition 5.4. The tests shall be conducted with coal as the exclusive fuel in the dryer. The performance test shall be conducted after the requirements of Permit Condition 13.8 have been satisfied. The permittee shall monitor and record the tons of wet pulp and CSB fed to the dryer, coal feed rate in tons per hour, and scrubber differential pressure of the scrubbers during each test. The permittee shall collect a representative sample of recirculated water from the scrubber during each test. The concentration of TDS in the sample water shall be analyzed, recorded, and expressed in milligrams of solids per liter of water.

**[IDAPA 66.04.04.405.02, 6410.4]**

**Operations and Maintenance Manual Requirements**

~~2.15 The permittee shall develop an O&M manual for the appropriate emissions control device(s) each of the following sources: (a) the B&W No. 1, B&W No. 2, and Riley boilers; (b) the South, Center, and North dryers; (c) the No. 1, 2, 3, 4, and 5 pellet mills; (d) the A and B lime kilns; (e) A and B process closets; (f) the drying granulator; (g) the No. 1 and No. 2 cooling granulators; (h) the process No. 2, specialty, and packaging line sugar handling systems; and (i) the lime kiln building. The permittee shall develop each O&M manual within the one year of issuance of the Tier II operating permit.~~

~~2.15.1 After the initial O&M manual development, the permittee shall update the control device monitoring program in the O&M manuals after each Department approved performance test.~~

~~2.15.2 The O&M manuals shall address the operation, maintenance, and repair of applicable control devices for each source to ensure good working order and operation as efficiently as practicable. The manuals shall include, at a minimum, a general description of the control device(s), normal operating conditions and procedures, startup, shutdown, and maintenance procedures, upset conditions and corrective procedures, methods of preventing malfunctions, appropriate corrective actions to be taken, provisions for monthly inspections during regular operations, and provisions for annual inspections during planned maintenance outages. The permittee shall keep records of maintenance activities in accordance with Facility Rule Condition 2.18.~~

~~2.15.3 The O&M manuals shall include a control device monitoring program that establishes control device operating parameters to be monitored, their acceptable operating ranges, corrective action levels, monitoring equipment and procedures, monitoring frequency, and frequency of record keeping. The monitoring parameters shall include, but are not limited to, any specific control device monitoring parameters required under any permit condition in this permit, unless the Department approves their removal from this permit condition. The control device monitoring program shall be developed by the permittee based on performance test results, vendor data, and other supporting documentation.~~

~~2.15.4 The O&M manuals shall be maintained onsite and shall be made available to Department representatives upon request.~~

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~~2.15.5 Whenever an operating parameter is outside the operating range specified by the control device monitoring program in an O&M manual, the permittee shall take corrective action as expeditiously as practicable to bring the operating parameter back within the operating range. Deviations from the operating range may not by themselves be considered deviations from applicable emissions standards, unless the Department determines that the frequency, duration, or magnitude of the deviations indicates that additional action is required.~~

~~[IDAPA 58.04.04.405.04, 5/1/04]~~

**Monitoring and Recordkeeping Requirements**

2.16 The permittee shall maintain sufficient recordkeeping to assure compliance with all of the terms and conditions of this operating permit. Records of monitoring information 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 Department representatives upon request.

~~[IDAPA 58.04.04.405.04, 5/1/04]~~

**Reporting and Certification Requirements**

~~2.17 Any reporting required by this permit, 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. Any reporting required by this permit shall be submitted to the following:~~

~~Air Quality Permit Compliance  
Department of Environmental Quality  
Boise Regional Office  
1445 N. Orchard  
Boise, ID 83708-2239  
Telephone: (208) 372-8550 Fax: (208) 373-0287~~

~~[IDAPA 58.04.04.421, 5/1/04; IDAPA 58.04.04.405.04, 5/1/04]~~

**Obligation to Comply**

~~2.18 Receiving a Tier II operating permit shall not relieve any owner or operator of the responsibility to comply with all applicable local, state, and federal rules and regulations.~~

~~[IDAPA 58.04.04.405, 5/1/04]~~

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**Location:** Nampa, Idaho

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**3. EMISSIONS UNIT – B&W NO. 1, B&W NO. 2, AND RILEY BOILERS (S-B1, S-B2, S-B3)**

**3.1 Process Description**

~~The three boilers permitted in this section are fired by pulverized coal and/or natural gas, and are used to supply steam for processes at the facility. Table 3.1 contains a description of each boiler.~~

**Table 3.1: BOILER DESCRIPTIONS**

| Boiler                          | Unit Number     | Installation Date | Rated Steam Capacity (lb/hr) |
|---------------------------------|-----------------|-------------------|------------------------------|
| <del>B&amp;W No. 1 boiler</del> | <del>S-B1</del> | <del>1942</del>   | <del>105,000</del>           |
| <del>B&amp;W No. 2 boiler</del> | <del>S-B2</del> | <del>1942</del>   | <del>105,000</del>           |
| <del>Riley boiler</del>         | <del>S-B3</del> | <del>1948</del>   | <del>250,000</del>           |

**3.2 Control Description**

~~Emissions from the B&W No. 1 and 2 boilers are controlled by a single baghouse (Unit No. A-B1/B2) manufactured by Western Precipitation/Leiy Manufacturing Co. Emissions from the Riley boiler are controlled by a baghouse (Unit No. A-B3) manufactured by Envirotech Corp.~~

**Emissions Limits**

**3.3 Emissions Limits**

Total emissions of PM<sub>10</sub> and CO from the B&W No. 1, B&W No. 2, and Riley boilers shall not exceed any corresponding emissions rate limits listed in the following table:

~~(B&W No. 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100)~~

**Table 3.2: EMISSIONS LIMITS FOR COAL/NATURAL GAS BOILERS**

| Source Description / Unit Number | PM <sub>10</sub> |       | CO             |                 |
|----------------------------------|------------------|-------|----------------|-----------------|
|                                  | lb/hr            | T/yr  | lb/hr          | T/yr            |
| B&W No. 1 boiler / S-B1          | 138.1            | 604.3 | <del>284</del> | <del>2500</del> |
| B&W No. 2 boiler / S-B2          |                  |       |                |                 |
| Riley boiler / S-B3              |                  |       |                |                 |

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## 3.4 Grain Loading Limit

The permittee shall not discharge PM to the atmosphere from the DSW No. 1, DSW No. 2, or Pilex boiler in excess of the concentrations shown in Table 3.2. When two fuels are burned concurrently, the allowable emissions shall be determined by proportioning the gross heat input and emissions standard for each fuel. The effluent gas volume shall be corrected to the oxygen concentration shown.

**Table 3.2: ALLOWABLE PARTICULATE EMISSIONS BASED ON FUEL TYPE**

| Fuel Type                                    | Allowable Particulate Emissions<br>(lb/hr) | Percent<br>Oxygen |
|----------------------------------------------|--------------------------------------------|-------------------|
| Coal, or combination of coal and natural gas | $0.100(\%^{1.25}) + 0.011(\%^{1.25})$      | 8.0               |
| Natural gas                                  | 0.015                                      | 8.0               |

- <sup>1</sup> percent of total heat input derived from the combustion of coal
- <sup>2</sup> percent of total heat input derived from the combustion of natural gas

[IDAPA 58.04.01.001-070, 8/1/04; Permit No. 15-0420-0010, 04/2/04]

## Operating Requirements

### 3.5 Throughput Limits

For each boiler, the maximum allowable coal feeding rate and natural gas-firing rate shall be limited to 120% of the average feed and firing rate attained during the most recent performance test conducted pursuant to Facility-wide Conditions 2.11.1 or 2.11.2, for which Department approval has been granted, which demonstrated compliance with applicable pollutant emissions limit(s), unless such a feed or firing rate would cause emissions to exceed any emissions limit(s) set forth in this permit.

[IDAPA 58.04.01.005.01, 8/1/04]

### 3.6 Fuel Limits

The permittee shall not use or fire coal with a sulfur content greater than 1% by weight.

[IDAPA 58.04.01.005, 8/1/04; IDAPA 58.04.01.005.01, 8/1/04]

### 3.7 Baghouse Operating Requirements

The baghouses shall be operated and maintained at all times during boiler operation. The pressure drop across each of the baghouses shall be maintained within manufacturer or O&M manual specifications.

[IDAPA 58.04.01.005.01, 8/1/04]

## Monitoring and Recordkeeping Requirements

### 3.8 Boiler Monitoring Requirements

The permittee shall monitor and record the information listed in Permit Conditions 3.8.1-3.8.8 for each boiler. The records shall be maintained in accordance with Facility-wide Condition 2.16.

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- 3.8.1 The average daily coal feed rate in tons per hour.
- 3.8.2 The coal feed rate for each consecutive 12-month period in tons per year.
- 3.8.3 The daily hours of operation with coal.
- 3.8.4 The heat input rate expressed in millions of British thermal units per hour by correlating the coal feed rate with the coal high-heating value.
- 3.8.5 The average daily natural gas-firing rate in millions of standard cubic feet per hour.
- 3.8.6 The natural gas-firing rate for each consecutive 12-month period in millions of standard cubic feet per year.
- 3.8.7 The daily hours of operation with natural gas.
- 3.8.8 The fuel type whenever the fuel type is changed. Fuel type in this section means natural gas only, coal only, or the combination of natural gas and coal.

[IDAPA 58.01.01.105.01, 511.04]

**3.9 Baghouse Monitoring Requirements**

The permittee shall install, operate, calibrate, and maintain measuring device(s) to continuously monitor the pressure drop across each of the baghouses. The pressure drop shall be recorded once per week while the boilers are in operation. In the event the measuring device becomes inoperable, it shall be repaired or replaced as soon as practicable. The records shall be maintained in accordance with Facility-wide Condition 2.16.

[IDAPA 58.01.01.105.01, 511.04]

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**4. EMISSIONS UNIT – UNION BOILER (S-B4)**

~~4.1 Process Description~~

~~The Union boiler is fired exclusively by natural gas and is used to supply steam to processes at the facility. This boiler was installed in 1957 and has a steaming capacity of 60,000 lb/hr.~~

~~4.2 Control Description~~

~~Emissions from the Union boiler are uncontrolled.~~

**Emissions Limits**

**4.3 Emissions Limits**

Emissions of PM<sub>10</sub> and CO from the Union boiler shall not exceed any corresponding emissions rate limits listed in Table 4.1.

[BAPA-00-01-01-105; 6/1/04]

Table 4.1: EMISSIONS LIMITS FOR UNION BOILER

| Source Description /<br>Unit Number | PM <sub>10</sub> |      | CO    |      |
|-------------------------------------|------------------|------|-------|------|
|                                     | lb/hr            | T/yr | lb/hr | T/yr |
| Union boiler / S-B4                 | 1.6              | 6.8  | 8.0   | 28.8 |

~~4.4 Grain Loading Limit~~

~~The permittee shall not discharge PM to the atmosphere from the Union boiler in excess of 0.045 grains of effluent gas corrected to 2% oxygen by volume.~~

[BAPA-00-01-01-077; 6/1/04]

**Operating Requirements**

**4.5 Throughput Limits**

The maximum allowable natural gas-firing rate of the Union boiler shall be limited to 120% of the average firing rate attained during the most recent performance test conducted pursuant to Facility-wide Condition 2.12.1, for which Department approval has been granted, which demonstrated compliance with applicable pollutant emissions limit(s), unless such a firing rate would cause emissions to exceed any emissions limit(s) set forth in this permit.

[BAPA-00-01-01-105-01; 6/1/04]

**4.6 Fuel Limit**

The Union boiler shall be fired exclusively by natural gas.

[BAPA-00-01-01-105-01; 6/1/04]



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**Monitoring and Recordkeeping Requirements**

**4.7 Boiler Monitoring Requirements**

The permittee shall install, operate, calibrate, and maintain measuring device(s) to continuously monitor the natural gas-firing rate of the boiler. The daily hours of operation shall be recorded and the average daily firing rate shall be recorded in millions of standard cubic feet per hour. The natural gas-firing rate for each consecutive 12-month period shall be recorded in millions of standard cubic feet per year. In the event the measuring device becomes inoperable, it shall be repaired or replaced as soon as practicable. The records shall be maintained in accordance with Facility-wide Condition 2.16.

[IDAP 1.02.04.01, 105.04, 54154]

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## 5. EMISSIONS UNIT – PULP DRYERS (S-D1, S-D2, S-D3)

### 5.1 Process Description

The three direct fired pulp dryers are used to dry processed best pulp and OBB for production of cattle feed. The dryers are pulverized coal and natural gas-fired. Table 5.1 contains a description of each dryer.

Table 5.1: DRYER DESCRIPTIONS

| Dryer  | Unit Number | Installation Date | Input Design Capacity (T/hr) |
|--------|-------------|-------------------|------------------------------|
| South  | S-D1        | 1983              | 55                           |
| Center | S-D2        | 1800              | 85                           |
| North  | S-D3        | 1950              | 95                           |

Within the fifth year of the permit term, the Center and North dryers will be replaced by a steam dryer system (refer to Permit Condition 13.8 of the Compliance Schedule in this permit).

### 5.2 Control Description

Each exhaust stream from the South and Center dryers is split into two streams. The exhaust streams from each dryer are then controlled by a cyclone and a spray impingement type scrubber in series. Emissions from the North dryer are controlled by a cyclone and a spray impingement type scrubber in series.

Table 5.2: DRYER CONTROL DESCRIPTIONS

| Emissions Unit/Unit Number | Emissions Control Device and Unit Number                                                     |
|----------------------------|----------------------------------------------------------------------------------------------|
| South pulp dryer / S-D1    | One cyclone and one spray impingement type scrubber in series / east stack (A-D1A and A-D1B) |
|                            | One cyclone and one spray impingement type scrubber in series / west stack (A-D1A and A-D1B) |
| Center pulp dryer / S-D2   | One cyclone and one spray impingement type scrubber in series / east stack (A-D2A and A-D2B) |
|                            | One cyclone and one spray impingement type scrubber in series / west stack (A-D2A and A-D2B) |
| North pulp dryer / S-D3    | One cyclone and one spray impingement type scrubber in series (A-D3A and A-D3B)              |

## Emissions Limits

### 5.3 Emissions Limits

Upon fulfillment of the requirements of Permit Condition 13.8, emissions of PM<sub>10</sub> and CO from the South dryer shall not exceed any corresponding emissions rate limits listed in Table 5.3.

[DADA-ES-01.04.103, S-D1-D2]

Table 5.3: EMISSIONS LIMITS FOR SOUTH DRYER

| Source Description / Unit Number | PM <sub>10</sub> |      | CO    |      |
|----------------------------------|------------------|------|-------|------|
|                                  | lb/hr            | T/yr | lb/hr | T/yr |
| South pulp dryer / S-D1          | 18.7             | 82.0 | 488.8 | 5502 |

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**5.4 Process Weight Rate Limit**

~~The permittee shall not emit PM to the atmosphere from any of the pulp dryers in excess of the amounts shown in the following equations, where E is the total rate of emissions from all emissions points from the source in pounds per hour and PW is the process weight in pounds per hour.~~

~~If PW is less than 17,000 lb/hr,~~

~~$E = 0.045(PW)^{0.80}$~~

~~If PW is equal to or greater than 17,000 lb/hr,~~

~~$E = 1.12(PW)^{0.27}$~~

[IDAPA 58.01.01.702, 4/5/00]

**Operating Requirements**

**5.5 Throughput Limits**

The maximum allowable throughput, coal feed rate, and natural gas-firing rate of the dryers shall be limited 120% to the average rate attained during the most recent performance test conducted pursuant to Facility-wide Conditions 2.10 or 2.14, for which Department approval has been granted, which demonstrated compliance with applicable pollutant emissions limit(s), unless such rates would cause emissions to exceed any emissions limit(s) set forth in this permit. Throughput of each dryer shall be represented by the sum of the masses of coal, if applicable, wet pulp, and CSB fed to the dryer, and shall in no case exceed 85 tons per hour for either the South or Center dryer, nor 25 tons per hour for the North dryer.

[IDAPA 58.01.01.405.01, 5/4/04]

**5.6 Fuel Limit**

~~The permittee shall not use or fire coal with a sulfur content greater than 4% by weight.~~

[IDAPA 58.01.01.725, 5/4/04]

**5.7 Cyclone and Scrubber Operating Requirements**

~~The cyclones and scrubbers shall be operated and maintained at all times during dryer operation. The scrubber differential pressure of the scrubbers shall be maintained within manufacturer or O&M manual specifications.~~

[IDAPA 58.01.01.405.01, 5/4/04]

**5.8 Scrubber Water Requirements**

~~The concentration of TDS in the scrubber water shall be maintained within manufacturer or O&M manual specifications.~~

[IDAPA 58.01.01.405.01, 5/4/04]

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**Monitoring and Recordkeeping Requirements**

**5.9 Dryer Monitoring Requirements**

The permittee shall monitor and record the information in Permit Conditions 5.9.1-5.9.9 for each dryer. The records shall be maintained in accordance with Facility-wide Condition 2.16.

- 5.9.1 The average daily coal feed rate in tons per hour.
- 5.9.2 The coal feed rate for each consecutive 12-month period in tons per year.
- 5.9.3 The daily hours of operation with coal.
- 5.9.4 The average daily natural gas-firing rate in millions of standard cubic feet per hour.
- 5.9.5 The natural gas-firing rate for each consecutive 12-month period in millions of standard cubic feet per year.
- 5.9.6 The daily hours of operation with natural gas.
- 5.9.7 The average daily throughput in tons per hour.
- 5.9.8 The throughput rate for each consecutive 12-month period in tons per year.
- 5.9.9 The dryer fuel type whenever the fuel type is changed. Fuel type in this section means natural gas only, coal only, or the combination of natural gas and coal.

**[IDAPA 58.04.04.405.01, 5/1/04]**

**5.10 Scrubber Monitoring Requirements**

The permittee shall install, operate, calibrate, and maintain measuring device(s) to continuously monitor the scrubber differential pressure of the scrubbers. The scrubber differential pressure shall be recorded once per week while the dryers are in operation. In the event the measuring device becomes inoperable, it shall be repaired or replaced as soon as practicable. The records shall be maintained in accordance with Facility-wide Condition 2.16.

**[IDAPA 58.04.04.405.01, 5/1/04]**

**5.11 Scrubber Water Monitoring Requirements**

The permittee shall collect a representative sample of recirculated water from the scrubber biweekly from the start through the end of the campaign. The concentration of TDS in the sample water shall be analyzed and recorded in milligrams of solids per liter of water. The records shall be maintained in accordance with Facility-wide Condition 2.16.

**[IDAPA 58.04.04.405.01, 5/1/04]**

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## 6. EMISSIONS UNIT – PELLET MILLS (S-D4, S-D5, S-D6, S-D7, S-D8)

### 6.1 Process Description

Pellet mills No. 1, 2, 3, 4, and 5 (Unit No. S-D4, S-D5, S-D6, S-D7, and S-D8, respectively) use forced ambient air to lower the temperature of the dry, pelletized pulp. The pellet mills are all manufactured by California Pellet Mill, and were installed at various dates ranging from 1956 to 1972. Pellet mills No. 1 and 5 each have rated capacities of 1.4 tons of pellets per hour. Pellet mills No. 2, 3, and 4 each have rated capacities of 8.8 tons of pellets per hour.

### 6.2 Control Description

Emissions from the pellet mills are controlled by five cyclones, one per each pellet mill exhaust stream (Unit No. A-D4, A-D5, A-D6, A-D7, and A-D8, respectively). Within the first year of the permit term, one common baghouse will be installed to reduce emissions from the pellet mills.

### Emissions Limits

#### 6.3 Emissions Limits

Upon fulfillment of the requirements of Permit Condition 13.4, total emissions of PM<sub>10</sub> from the pellet mills shall not exceed any corresponding emissions rate limits listed in Table 6.1.

[BAPR-59.04.04-193, 5/11/94]

Table 6.1: EMISSIONS LIMITS FOR PELLET MILLS

| Source Description /<br>Unit Number | PM <sub>10</sub> |      |
|-------------------------------------|------------------|------|
|                                     | lb/hr            | T/yr |
| Pellet mill No. 1 / S-D4            | 0.8              | 3.1  |
| Pellet mill No. 2 / S-D5            |                  |      |
| Pellet mill No. 3 / S-D6            |                  |      |
| Pellet mill No. 4 / S-D7            |                  |      |
| Pellet mill No. 5 / S-D8            |                  |      |

#### 6.4 Process Weight Rate Limit

The permittee shall not emit PM to the atmosphere from the pellet mills in excess of the amounts shown in the following equations, where E is the total rate of emissions from all emissions points from the source in pounds per hour and PW is the process weight in pounds per hour.

— If PW is less than 17,000 lb/hr,

$$E = 0.045(PW)^{0.60}$$

— If PW is equal to or greater than 17,000 lb/hr,

$$E = 1.12(PW)^{0.27}$$

[BAPR-59.04.04-762, 4/6/90]

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**Operating Requirements**

**6.5 Throughput Limits**

The total, combined pellet throughput of the mills shall be limited to the average, total throughput rate attained for the pellet mills during the most recent performance test conducted pursuant to Facility-wide Conditions 2.11.3, for which Department approval has been granted, which demonstrated compliance with applicable pollutant emissions limit(s), unless such a throughput rate would cause emissions to exceed any emissions limit(s) set forth in this permit.

[IDAPA 50.01.01.405.01, 5/1/04]

**6.6 Baghouse Operating Requirements**

Within the first year of the permit term, a baghouse shall be installed on the pellet mills' exhaust stream(s) prior to release to the atmosphere. The baghouse shall be operated and maintained at all times during pellet mill operation. The pressure drop across the baghouse shall be maintained within manufacturer or O&M manual specifications.

[IDAPA 50.01.01.405.01, 5/1/04]

**Monitoring and Recordkeeping Requirements**

**6.7 Pellet Mill Monitoring Requirements**

The permittee shall monitor and record the information in Permit Conditions 6.7.1 and 6.7.2 for the pellet mills. The records shall be maintained in accordance with Facility-wide Condition 2.16.

**6.7.1** The average daily throughput in T/hr;

**6.7.2** The throughput for each consecutive 12-month period in T/yr.

[IDAPA 50.01.01.405.01, 5/1/04]

**6.8 Baghouse Monitoring Requirements**

Within the first year of the permit term, the permittee shall install, operate, calibrate, and maintain measuring device(s) to continuously monitor the pressure drop across the baghouse. The pressure drop shall be recorded once per week while the pellet mills are in operation. In the event that any measuring device becomes inoperable, it shall be repaired or replaced as soon as practicable. The records shall be maintained in accordance with Facility-wide Condition 2.16.

[IDAPA 50.01.01.405.01, 5/1/04]

# AIR QUALITY TIER II OPERATING PERMIT NUMBER: 027-00010

Applicant: The Amalgamated Sugar Co. LLC  
Location: Nampa, Idaho

Date Issued: September 30, 2002  
Date Expires: September 30, 2007

## 7. EMISSIONS UNIT – A AND B LIME KILNS (S-K1, S-K2)

### 7.1 ~~Process Description~~

~~The A and B lime kilns (Unit No. S-K1 and S-K2, respectively) are used to produce burnt lime from a mixture of coke and lime rock. The kilns have a batch feed system, but operate continuously. Both kilns were manufactured by Belgium Lime Kiln. The A lime kiln was installed in 1942 and has a rated capacity of 298 tons of lime rock per day. The B lime kiln was installed in 1988 and has a rated capacity of 277 tons of lime rock per day.~~

### 7.2 ~~Control Description~~

~~Approximately 40% of the emissions from each kiln are controlled by a baghouse (Unit No. A-K4B). Emissions are only directed to the baghouse during kiln loading events. The remaining emissions (i.e., between loading events) from the A lime kiln are sent through two gas washers (Unit No. A-K4A) and the A lime kiln carbonation system (Unit No. A-K4B), in series. The remaining emissions (i.e., between loading events) from the B lime kiln are sent through the two gas washers (Unit No. A-K2A) and the B lime kiln carbonation system (Unit No. A-K2B), in series. After the carbonation systems, any excess CO emissions are vented to the atmosphere.~~

### Emissions Limits

#### 7.3 Emissions Limits

Emissions of PM<sub>10</sub> and CO from the lime kilns shall not exceed any corresponding emissions rate limits listed in Table 7.1.

[IDAPA-58.01.01.102, 6/4/04]

Table 7.1: EMISSIONS LIMITS FOR LIME KILNS

| Source Description /<br>Unit Number | PM <sub>10</sub> |      | CO              |                  |
|-------------------------------------|------------------|------|-----------------|------------------|
|                                     | lb/hr            | T/yr | lb/hr           | T/yr             |
| A lime kiln / S-K1                  | 0.1              | 0.4  | <del>4000</del> | <del>36000</del> |
| B lime kiln / S-K2                  | 0.1              | 0.5  | <del>4000</del> | <del>36000</del> |

#### 7.4 ~~Process Weight Rate Limit~~

~~The permittee shall not emit PM to the atmosphere from either of the lime kilns in excess of the amounts shown in the following equations, where E is the total rate of emissions from all emissions points from the source in pounds per hour and PW is the process weight in pounds per hour.~~

- ~~• If PW is less than 17,000 lb/hr,~~

~~$$E = 0.045(PW)^{0.80}$$~~

- ~~• If PW is equal to or greater than 17,000 lb/hr,~~

~~$$E = 1.12(PW)^{0.77}$$~~

[IDAPA-58.01.01.102, 4/8/04]

**AIR QUALITY TIER II OPERATING PERMIT NUMBER: 027-00010**

**Permittee:** The Amalgamated Sugar Co. LLC  
**Location:** Nampa, Idaho

**Date Issued:** September 30, 2002  
**Date Expires:** September 30, 2007

**Operating Requirements**

**7.5 Throughput Limits**

The maximum allowable lime rock throughput of each kiln shall be limited to 120% of the average throughput rates attained during the most recent performance test conducted pursuant to Facility-wide Condition 2.11.4, for which Department approval has been granted, which demonstrated compliance with applicable pollutant emissions limit(s), unless such a throughput rate would cause emissions to exceed any emissions limit(s) set forth in this permit.

[IDAPA 58.01.01.400.01, 5/1/04]

**~~7.6 Baghouse Operating Requirements~~**

~~The baghouse shall be operated and maintained at all times during kiln operation. The pressure drop across the baghouse shall be maintained within manufacturer or OEM manual specifications.~~

[IDAPA 58.01.01.400.01, 5/1/04]

**Monitoring and Recordkeeping Requirements**

**7.7 Lime Kiln Monitoring Requirements**

The permittee shall monitor and record the information in Permit Conditions 7.7.1 and 7.7.2 for each lime kiln. The records shall be maintained in accordance with Facility-wide Condition 2.16.

7.7.1 The average daily lime rock throughput in tons per hour.

7.7.2 The lime rock throughput for each consecutive 12-month period in tons per year.

[IDAPA 58.01.01.400.01, 5/1/04]

**7.8 Baghouse Monitoring Requirements**

The permittee shall install, operate, calibrate, and maintain measuring device(s) to continuously monitor the pressure drop across the baghouse. The pressure drop shall be recorded once per week when the lime kilns are in operation. In the event the measuring device becomes inoperable, it shall be repaired or replaced as soon as practicable. The records shall be maintained in accordance with Facility-wide Condition 2.16.

[IDAPA 58.01.01.400.01, 5/1/04]



**AIR QUALITY TIER II OPERATING PERMIT NUMBER: 027-00010**

**Permittee:** The Amalgamated Sugar Co. LLC  
**Location:** Nampa, Idaho

**Date Issued:** September 30, 2002  
**Date Expires:** September 30, 2007

**8. EMISSIONS UNIT – PROCESS SLAKERS (S-K4)**

**8.1 Process Description**

The facility operates two lime slakers (A and B) to produce milk of lime from crushed calcium oxide rocks and water. The slakers were manufactured by Ogden Iron Works and are operated as batch systems. The slakers were installed in 1968. The total rated capacity of both slakers is 257 tons of calcium oxide rock per day.

**8.2 Control Description**

Emissions from the slakers are controlled by one spray chamber-type scrubber (Unit No. A-K4).

**Emissions Limits**

**8.3 Emissions Limits**

Emissions of PM<sub>10</sub> from the process slakers shall not exceed any corresponding emissions rate limits listed in Table 8.1.

[IDAPA 52.01.01.405, 5/1/94]

Table 8.1: EMISSIONS LIMITS FOR PROCESS SLAKERS

| Source Description /<br>Unit Number | PM <sub>10</sub> |      |
|-------------------------------------|------------------|------|
|                                     | lb/hr            | T/yr |
| A and B process slakers / S-K4      | 1.4              | 6.1  |

**8.4 Process Weight Rate Limit**

The permittee shall not emit PM to the atmosphere from the process slakers in excess of the amounts shown in the following equations, where E is the total rate of emissions from all emissions points from the source in pounds per hour and PWR is the process weight in pounds per hour.

~~If PWR is less than 17,000 lb/hr,~~

$$E = 0.045(PWR)^{0.60}$$

~~If PWR is equal to or greater than 17,000 lb/hr,~~

$$E = 1.12(PWR)^{0.27}$$

[IDAPA 52.01.01.702, 4/3/00]

**Operating Requirements**

**8.5 Throughput Limits**

The maximum allowable calcium oxide rock throughput of each process slaker shall be limited to 120% of the average throughput rates attained during the most recent performance test conducted pursuant to Facility-wide Condition 2.12.2, for which Department approval has been granted, which demonstrated compliance with applicable pollutant emissions limit(s), unless such a throughput rate would cause emissions to exceed any emissions limit(s) set forth in this permit.

[IDAPA 52.01.01.405.01, 5/1/94]

**AIR QUALITY TIER II OPERATING PERMIT NUMBER: 027-00010**

**Permittee:** The Amalgamated Sugar Co. LLC  
**Location:** Nampa, Idaho

**Date Issued:** September 30, 2002  
~~**Date Expires:** September 30, 2007~~

**8.6 Scrubber Operating Requirements**

~~The scrubber shall be operated and maintained at all times during slaker operation. The scrubber nozzle header pressure shall be maintained within manufacturer or OEM manual specifications.~~

~~[IDAPA 58.04.01.405.01, 5/1/94]~~

**Monitoring and Recordkeeping Requirements**

**8.7 Process Slaker Monitoring Requirements**

The permittee shall monitor and record the information in Permit Conditions 8.7.1 and 8.7.2 for each process slaker. The records shall be maintained in accordance with Facility-wide Condition 2.16.

8.7.1 The average daily calcium oxide rock throughput in tons per hour.

8.7.2 The calcium oxide rock throughput for each consecutive 12-month period in tons per year.

~~[IDAPA 58.04.01.405.01, 5/1/94]~~

**8.8 Scrubber Monitoring Requirements**

The permittee shall install, operate, calibrate, and maintain measuring device(s) to continuously monitor the scrubber nozzle header pressure. The scrubber nozzle header pressure shall be recorded once per week when the process slakers are in operation. In the event the measuring device becomes inoperable, it shall be repaired or replaced as soon as practicable. The records shall be maintained in accordance with Facility-wide Condition 2.16.

~~[IDAPA 58.04.01.405.01, 5/1/94]~~

**AIR QUALITY TIER II OPERATING PERMIT NUMBER: 027-00010**

**Permittee:** The Amalgamated Sugar Co. LLC  
**Location:** Nampa, Idaho

**Date Issued:** September 30, 2002  
**Date Expires:** September 28, 2007

**9. EMISSIONS UNIT – DRYING GRANULATOR (S-W1)**

**9.1 ~~Process Description~~**

~~The facility operates a drying granulator to dry wet sugar. The drying granulator was manufactured by TADCO and installed in 1987 as a replacement for an existing drying granulator. The rated capacity of the granulator is 45 tons of sugar per hour.~~

**9.2 ~~Control Description~~**

~~Emissions from the drying granulator are controlled by a dust box type scrubber (Unit No. A-W1). The scrubber uses thin juice as the fluid scrubbing media.~~

**~~Emissions Limits~~**

**9.3 Emissions Limits**

Emissions of PM<sub>10</sub> from the drying granulator shall not exceed any corresponding emissions rate limits listed in Table 9.1.

[IDAPA 58.04.04.105, 5/1/04]

Table 9.1: EMISSIONS LIMITS FOR DRYING GRANULATOR

| Source Description /<br>Unit Number | PM <sub>10</sub> |      |
|-------------------------------------|------------------|------|
|                                     | lb/hr            | T/yr |
| Drying granulator / S-W1            | 1.1              | 5.0  |

**9.4 ~~Process Weight Rate Limit~~**

~~The permittee shall not emit PM to the atmosphere from the drying granulator in excess of the amounts shown in the following equations, where E is the total rate of emissions from all emissions points from the source in lb/hr and PWR is the process weight in lb/hr.~~

~~• If PWR is less than 0,250 lb/hr,~~

$$\del{E = 0.045(PWR)^{0.75}}$$

~~• If PWR is equal to or greater than 0,250 lb/hr,~~

$$\del{E = 1.40(PWR)^{0.25}}$$

[IDAPA 58.04.04.704, 4/5/00]

**Operating Requirements**

**9.5 Throughput Limits**

The maximum allowable throughput of the drying granulator shall be limited to 120% of the average throughput rates attained during the most recent performance test conducted pursuant to Facility-wide Condition 2.12.3, for which Department approval has been granted, which demonstrated compliance with applicable pollutant emissions limit(s), unless such a throughput rate would cause emissions to exceed any emissions limit(s) set forth in this permit.

[IDAPA 58.04.04.105.04, 5/1/04]

**AIR QUALITY TIER II OPERATING PERMIT NUMBER: 027-00010**

**Permittee:** The Amalgamated Sugar Co. LLC  
**Location:** Nampa, Idaho

**Date Issued:** September 30, 2002  
**Date Expires:** September 30, 2007

**9.6 Scrubber Operating Requirements**

~~The scrubber shall be operated and maintained at all times during granulator operation. The brix of the scrubber fluid shall be maintained within manufacturer or G&M manual specifications. Brix is defined as percent solids in this juice.~~

~~(IDAPA 58.04.04.405.04, 5/1/04)~~

**Monitoring and Recordkeeping Requirements**

**9.7 Drying Granulator Monitoring Requirements**

The permittee shall monitor and record the information in Permit Conditions 9.7.1 and 9.7.2 for the drying granulator. The records shall be maintained in accordance with Facility-wide Condition 2.16.

9.7.1 The average daily throughput in tons per hour.

9.7.2 The throughput for each consecutive 12-month period in tons per year.

~~(IDAPA 58.04.04.405.04, 5/1/04)~~

**9.8 Scrubber Monitoring Requirements**

The permittee shall install, operate, calibrate, and maintain measuring device(s) to continuously monitor the brix of the scrubber fluid. The brix shall be recorded once per day while the drying granulator is in operation. In the event the measuring device becomes inoperable, it shall be repaired or replaced as soon as practicable. The records shall be maintained in accordance with Facility-wide Condition 2.16.

~~(IDAPA 58.04.04.405.04, 5/1/04)~~

**AIR QUALITY TIER II OPERATING PERMIT NUMBER: 027-00010**

**Permittee:** The Amalgamated Sugar Co. LLC  
**Location:** Nampa, Idaho

**Date Issued:** September 30, 2002  
**Date Expires:** September 30, 2007

**10. EMISSIONS UNIT -- NO. 1 AND NO. 2 COOLING GRANULATORS (S-W2, S-W3)**

**10.1 Process Description**

~~The facility operates the No. 1 and 2 cooling granulators (Unit No. S-W2 and S-W3, respectively) to cool hot sugar from the drying granulator. The No. 1 cooling granulator was manufactured by Horsey and was installed in 1944. The No. 2 cooling granulator was manufactured by Great Western Sugar and was installed in 1984. For the Tier II operating permit application, the rated capacity of each granulator is 97.5 tons of sugar per hour.~~

**10.2 Control Description**

~~Emissions from the No. 1 and 2 cooling granulators are controlled by one of two baghouses (Unit No. A-W2 and A-W3, respectively). Both baghouses were manufactured by DFC, Inc.~~

**Emissions Limits**

**10.3 Emissions Limits**

Emissions of PM<sub>10</sub> from the cooling granulators shall not exceed any corresponding emissions rate limits listed in Table 10.1.

~~IDAAPA-00-01-01-100, 5/4/04~~

**Table 10.1: EMISSIONS LIMITS FOR COOLING GRANULATORS**

| Source Description /<br>Unit Number | PM <sub>10</sub> |      |
|-------------------------------------|------------------|------|
|                                     | lb/hr            | T/yr |
| No. 1 cooling granulator / S-W2     | 0.3              | 1.3  |
| No. 2 cooling granulator / S-W3     | 0.3              | 1.3  |

**10.4 Process Weight Rate Limit for Cooler No. 1**

~~The permittee shall not emit PM to the atmosphere from No. 1 cooling granulator in excess of the amounts shown in the following equations, where E is the total rate of emissions from all emissions points from the source in pounds per hour and PW is the process weight in pounds per hour.~~

- ~~• If PW is less than 17,000 lb/hr,  

$$E = 0.043(PW)^{0.80}$$~~
- ~~• If PW is equal to or greater than 17,000 lb/hr,  

$$E = 1.42(PW)^{0.77}$$~~

~~IDAAPA-00-01-01-102, 4/6/00~~

**10.5 Process Weight Rate Limit for Cooler No. 2**

~~The permittee shall not emit PM to the atmosphere from No. 2 cooling granulator in excess of the amounts shown in the following equations, where E is the total rate of emissions from all emissions points from the source in pounds per hour and PW is the process weight in pounds per hour.~~

**AIR QUALITY TIER II OPERATING PERMIT NUMBER: 027-00010**

Permittee: The Amalgamated Sugar Co. LLC  
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Date Issued: September 30, 2002  
Date Expires: September 30, 2007

- ~~• If  $PW$  is less than 0.250 lb/hr,  
 $E = 0.045(PW)^{0.80}$~~
- ~~• If  $PW$  is equal to or greater than 0.250 lb/hr,  
 $E = 4.10(PW)^{0.25}$~~

[IDAPA 58.04.01.402.01, 5/1/00]

**Operating Requirements**

**10.6 Throughput Limits**

The maximum allowable throughput of each cooling granulator shall be limited to 120% of the average throughput rate attained during the most recent performance test conducted pursuant to Facility-wide Condition 2.13.1, for which Department approval has been granted, which demonstrated compliance with applicable pollutant emissions limit(s), unless such throughput rates would cause emissions to exceed any emissions limit(s) set forth in this permit. The most recent Department-approved performance test conducted on the No. 1 cooling granulator shall be utilized to establish throughput limits for the No. 2 cooling granulator.

[IDAPA 58.04.01.402.01, 5/1/00]

~~**10.7 Baghouse Operating Requirements**~~

~~The baghouses shall be operated and maintained at all times during granulator operation. The pressure drop across the baghouses shall be maintained within manufacturer or O&M manual specifications.~~

[IDAPA 58.04.01.402.01, 5/1/00]

~~**Monitoring and Recordkeeping Requirements**~~

**10.8 Cooling Granulator Monitoring Requirements**

The permittee shall monitor and record the information in Permit Conditions 10.8.1 and 10.8.2 for each cooling granulator. The records shall be maintained in accordance with Facility-wide Condition 2.18.

10.8.1 The average daily throughput in tons per hour.

10.8.2 The throughput for each consecutive 12-month period in tons per year.

[IDAPA 58.04.01.402.01, 5/1/00]

**10.9 Baghouse Monitoring Requirements**

The permittee shall install, operate, calibrate, and maintain measuring device(s) to continuously monitor the pressure drop across each of the baghouses. The pressure drops shall be recorded once per week while the cooling granulators are in operation. In the event the measuring device becomes inoperable, it shall be repaired or replaced as soon as practicable. The records shall be maintained in accordance with Facility-wide Condition 2.16.

[IDAPA 58.04.01.402.01, 5/1/00]

**AIR QUALITY TIER II OPERATING PERMIT NUMBER: 027-00010**

**Applicant:** The Amalgamated Sugar Co. LLC  
**Location:** Nampa, Idaho

**Date issued:** September 30, 2002  
**Date Expires:** September 30, 2007

**11. EMISSIONS UNIT – PROCESS NO. 2, SPECIALTIES, AND PACKAGING-LINE SUGAR HANDLING SYSTEMS (S-W4, S-W6, S-W7)**

**11.1 Process Description**

The emissions regulated in this section of the permit are emitted from three sugar handling systems. The unit number and installation date of each handling line are presented in Table 11.1.

**Table 11.1: SOURCE DESCRIPTIONS**

| Source                | Unit Number | Installation Date |
|-----------------------|-------------|-------------------|
| Process No. 2 system  | S-W4        | 1999              |
| Specialties system    | S-W6        | 1999              |
| Packaging-line system | S-W7        | 1999              |

The process No. 2 sugar handling system consists of elevators, scrolls, baggers, rollers, screen stations, bagging stations, and scales. The specialties sugar handling system consists of a palletizing belt and tote machine. The packaging-line sugar handling system consists of scrolls, baggers, and a loading scale.

**11.2 Control Description**

Emissions from the process No. 2, specialties, and packaging-line sugar handling systems are controlled by one of three Milco Pulcoair baghouses (Unit No. A-W4, A-W6, A-W7, respectively).

**Emissions Limits**

**11.3 Emissions Limits**

Emissions of PM<sub>10</sub> from the sugar handling systems shall not exceed any corresponding emissions rate limits listed in Table 11.2.

[IDAPA-51041-002, 511041]

**Table 11.2: EMISSIONS LIMITS FOR SUGAR HANDLING SYSTEMS**

| Source Description /<br>Unit Number | PM <sub>10</sub> |      |
|-------------------------------------|------------------|------|
|                                     | lb/hr            | T/yr |
| Process No. 2 system / S-W4         | 0.3              | 1.2  |
| Specialties system / S-W6           | 0.1              | 0.6  |
| Packaging-line system / S-W7        | 0.2              | 0.9  |

# AIR QUALITY TIER II OPERATING PERMIT NUMBER: 027-00010

Permittee: The Amalgamated Sugar Co. LLC  
Location: Nampa, Idaho

Date Issued: September 30, 2002  
Date Expires: September 30, 2007

## ~~11.4 Process Weight Rate Limit for No. 2 Process and Specialties Lines~~

~~The permittee shall not emit PM to the atmosphere from the No. 2 process or specialties lines in excess of the amounts shown in the following equations, where E is the total rate of emissions from all emissions points from the source in pounds per hour and PW is the process weight in pounds per hour.~~

- ~~• If PW is less than 17,000 lb/hr,  
 $E = 0.045(PW)^{0.60}$~~
- ~~• If PW is equal to or greater than 17,000 lb/hr,  
 $E = 4.10(PW)^{0.27}$~~

[IDAPA 38.01.01.702, 4/3/00]

## ~~11.5 Process Weight Rate Limit for Packaging Line~~

~~The permittee shall not emit PM to the atmosphere from the packaging line in excess of the amounts shown in the following equations, where E is the total rate of emissions from all emissions points from the source in pounds per hour and PW is the process weight in pounds per hour.~~

- ~~• If PW is less than 0.250 lb/hr,  
 $E = 0.045(PW)^{0.60}$~~
- ~~• If PW is equal to or greater than 0.250 lb/hr,  
 $E = 4.10(PW)^{0.25}$~~

[IDAPA 58.04.01.701, 4/3/00]

## ~~Operating Requirements~~

### 11.6 Throughput Limits

The maximum allowable throughput of each sugar handling system shall be limited to 120% of the average throughput rates attained during the most recent performance test conducted pursuant to Facility-wide Condition 2.13.2, for which Department approval has been granted, which demonstrated compliance with applicable pollutant emissions limit(s), unless such throughput rates would cause emissions to exceed any emissions limit(s) set forth in this permit.

[IDAPA 58.04.01.405.01, 5/4/01]

### ~~11.7 Baghouse Operating Requirements~~

~~The baghouses shall be operated and maintained at all times during the operation of the No. 2 process line, specialties line, or packaging line. The pressure drop across each baghouse shall be maintained within manufacturer or O&M manual specifications.~~

[IDAPA 58.04.01.405.01, 5/4/01]



**AIR QUALITY TIER II OPERATING PERMIT NUMBER: 027-00010**

**Permittee:** The Amalgamated Sugar Co. LLC  
**Location:** Nampa, Idaho

**Date Issued:** September 30, 2002  
**Date Expires:** September 30, 2007

**Monitoring and Recordkeeping Requirements**

**11.8 Sugar Handling System Monitoring Requirements**

The permittee shall monitor and record the information in Permit Conditions 11.8.1 and 11.8.2 for each sugar handling system. The records shall be maintained in accordance with Facility-wide Condition 2.16.

11.8.1 The average daily throughput in tons per hour.

11.8.2 The throughput for each consecutive 12-month period in tons per year.

[IDAPA 58.01.01.405.01, 3/1/94]

**11.9 Baghouse Monitoring Requirements**

The permittee shall install, operate, calibrate, and maintain measuring device(s) to continuously monitor the pressure drop across each of the baghouses. The pressure drops shall be recorded once per week while the sugar handling systems are in operation. In the event the measuring device becomes inoperable, it shall be repaired or replaced as soon as practicable. The records shall be maintained in accordance with Facility-wide Condition 2.16.

[IDAPA 58.01.01.405.01, 3/1/94]

**AIR QUALITY TIER II OPERATING PERMIT NUMBER: 027-00010**

**Permittee:** The Amalgamated Sugar Co. LLC  
**Location:** Nampa, Idaho

**Date Issued:** September 30, 2002  
**Date Expires:** September 30, 2007

**12. EMISSIONS UNIT – LIME KILN BUILDING (S-K3)**

**12.1 Process Description**

~~Emissions from the vents of the lime kiln building (Unit No. S-K3) are created by one crusher and all coke, lime rock, and calcium oxide handling processes within the building. Emissions from the lime kiln building are based on the input of lime rock to the kilns (refer to Appendix E of the Tier II application). For the Tier I operating permit application, the maximum throughput is 814 tons of lime rock per day.~~

**12.2 Control Description**

~~Emissions from the lime kiln building are controlled by one Micro-Pulse baghouse (Unit No. A-K6).~~

**Emissions Limits**

**12.3 Emissions Limits**

Emissions of PM<sub>10</sub> from the lime kiln building shall not exceed any corresponding emissions rate limits listed in Table 12.1.

(ISAP 1-55-01-01-100, 5/1/04)

**Table 12.1: EMISSIONS LIMITS FOR LIME KILN BUILDING**

| Source Description /<br>Unit Number | PM <sub>10</sub> |      |
|-------------------------------------|------------------|------|
|                                     | lb/hr            | T/yr |
| Lime kiln building / S-K3           | 0.8              | 3.5  |

**12.4 Process Weight Rate Limit**

~~The permittee shall not emit PM to the atmosphere from the lime kiln building in excess of the amounts shown in the following equations, where E is the total rate of emissions from all emissions points from the source in pounds per hour and PW is the process weight in pounds per hour.~~

~~• If PM is less than 17,000 lb/hr,~~

~~$E = 0.045(PW)^{0.85}$~~

~~• If PW is equal to or greater than 17,000 lb/hr,~~

~~$E = 1.42(PW)^{0.77}$~~

(ISAP 1-55-01-01-100, 10/00)

**AIR QUALITY TIER II OPERATING PERMIT NUMBER: 027-00010**

**Permittee:** The Amalgamated Sugar Co. LLC  
**Location:** Nampa, Idaho

**Date Issued:** September 30, 2002  
**Date Expires:** September 30, 2007

**Operating Requirements**

**12.5 Throughput Limits**

The maximum allowable throughput of lime rock to the kilns shall be limited to 120% of the average throughput rates attained during the most recent performance test conducted pursuant to Facility-wide Condition 2.13.3, for which Department approval has been granted, which demonstrated compliance with applicable pollutant emissions limit(s), unless such throughput rates would cause emissions to exceed any emissions limit(s) set forth in this permit.

**[IDAPA-53.04.01.405.01, 5/1/04]**

**~~12.6 Baghouse Operating Requirements~~**

~~The lime kiln building baghouse shall be operated and maintained at all times during operation of the crusher or any coke, lime rock, and calcium oxide handling processes within the lime kiln building. The pressure drop across the lime kiln building baghouse shall be maintained within manufacturer O&M manual specifications.~~

**~~[IDAPA-53.04.01.405.01, 5/1/04]~~**

**Monitoring and Recordkeeping Requirements**

**12.7 Lime Kiln Building Throughput Monitoring Requirements**

The permittee shall monitor and record the information in Permit Conditions 12.7.1 and 12.7.2 for the lime kiln building. The records shall be maintained in accordance with Facility-wide Condition 2.16.

12.7.1 The average daily throughput of lime rock to the kilns in tons per hour.

12.7.2 The throughput of lime rock to the kilns for each consecutive 12-month period in tons per year.

**[IDAPA-53.04.01.405.01, 5/1/04]**

**12.8 Baghouse Monitoring Requirements**

The permittee shall install, operate, calibrate, and maintain measuring device(s) to continuously monitor the pressure drop across the lime kiln building baghouse. The pressure drop shall be recorded once per week while the crusher and/or any coke, lime rock, or calcium oxide-handling processes are in operation. In the event the measuring device becomes inoperable, it shall be repaired or replaced as soon as practicable. The records shall be maintained in accordance with Facility-wide Condition 2.16.

**[IDAPA-53.04.01.405.01, 5/1/04]**

# AIR QUALITY TIER II OPERATING PERMIT NUMBER: 027-00010

Permittee: The Amalgamated Sugar Co. LLC  
Location: Nampa, Idaho

Date Issued: September 30, 2002  
Date Expires: September 30, 2007

## 13. COMPLIANCE SCHEDULE

13.1 To ensure compliance with applicable requirements in the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.001 et. seq, the permittee shall implement the compliance schedule presented in Table 13.1. Permit Conditions 13.3-13.9 are necessary to ensure that emissions from the facility do not cause or significantly contribute to a violation of the NAAQS. Any changes in the equipment, control technology, or timeframes specified in this compliance schedule must be approved by the Department.

Table 13.1: COMPLIANCE SCHEDULE

| Permit Conditions | Milestone                                                  | Deadline                                                          | Documentation/Reporting                                                       |
|-------------------|------------------------------------------------------------|-------------------------------------------------------------------|-------------------------------------------------------------------------------|
| <del>13.3</del>   | <del>Facility Dust Management Plan Implementation</del>    | <del>60 days after issuance of Tier II operating permit</del>     | <del>Permit Conditions 2.2, 2.3, 2.4<br/>Department notification</del>        |
| 13.4              | Installation and operation of pellet mill cyclone baghouse | One year after issuance of Tier II operating permit               | Permit Conditions 6.7 and 6.8                                                 |
|                   | Flue gases from Riley boiler merged into the B&W stack     |                                                                   | Facility-wide Conditions 2.11.1-2.11.3<br>Department notification             |
| <del>13.5</del>   | <del>Install best cleaning system</del>                    | <del>Two years after issuance of Tier II operating permit</del>   | <del>Submit PTC application for steam dryer<br/>Department notification</del> |
| <del>13.6</del>   | <del>Install transformer evaporator and mill heaters</del> | <del>Three years after issuance of Tier II operating permit</del> | <del>Department notification</del>                                            |
| 13.7              | Order and fabricate steam dryer                            | Four years after issuance of Tier II operating permit             | Department notification                                                       |
| 13.8              | Installation and operation of steam dryer system           | Five years after issuance of Tier II operating permit             | Department notification                                                       |
|                   | Performance test requirements for South dryer              |                                                                   | Facility-wide Condition 2.14                                                  |
|                   | Closure of the Center and North dryers                     |                                                                   | Tier II operating permit application                                          |

13.2 Upon issuance of the Tier II operating permit, emissions of PM<sub>10</sub> and CO from the South, Center, and North dryers and the No. 1, 2, 3, 4, and 5 pellet mills shall not exceed any corresponding emissions rate limits listed in the following table:

Table 13.2: EMISSIONS LIMITS FOR DRYERS AND PELLET MILLS

| Source Description / Unit Number | PM <sub>10</sub> |       | CO               |                    |
|----------------------------------|------------------|-------|------------------|--------------------|
|                                  | lb/hr            | T/yr  | lb/hr            | T/yr               |
| South pulp dryer / S-D1          | 37.4             | 164.0 | <del>440.0</del> | <del>2,400.0</del> |
| Center pulp dryer / S-D2         | 37.4             | 164.0 | <del>440.0</del> | <del>2,400.0</del> |
| North pulp dryer / S-D3          | 28.4             | 124.4 | <del>330.0</del> | <del>1,740.0</del> |
| Pellet mill No. 1 / S-D4         | 1.8              | 7.8   |                  |                    |
| Pellet mill No. 2 / S-D5         | 2.7              | 11.8  |                  |                    |
| Pellet mill No. 3 / S-D6         | 2.7              | 11.8  |                  |                    |
| Pellet mill No. 4 / S-D7         | 2.7              | 11.8  |                  |                    |
| Pellet mill No. 5 / S-D8         | 1.8              | 7.8   |                  |                    |

AIR QUALITY TIER II OPERATING PERMIT NUMBER: 027-00010

Permittee: The Amalgamated Sugar Co. LLC  
Location: Nampa, Idaho

Date Issued: September 30, 2002  
Date Expires: September 30, 2007

13.2.1 Upon completion of Permit Condition 13.4.1, emissions of PM<sub>10</sub> from the pellet mills shall comply with Permit Condition 6.3. Upon completion of Permit Conditions 13.8.1 and 13.8.2, emissions of PM<sub>10</sub> and CO from the South dryer shall comply with Permit Condition 5.3.

~~IDAPA 58.01.01.103.02, 5/1/04~~

~~13.2 Within 60 days of the issuance of the Tier II operating permit, TASCOCO shall comply with the following permit conditions:~~

~~13.2.1 The provisions of Facility-wide Conditions 2.1-2.4 shall be fully implemented, including all required monitoring and recording.~~

~~13.2.2 When the requirements of Permit Condition 13.2.1 have been fulfilled, the permittee shall notify the Department in writing. The permittee shall notify the Department in writing of any delay or failure to meet the requirements of Permit Condition 13.2 as expeditiously as reasonably possible.~~

~~IDAPA 58.01.01.103.02, 5/1/04; IDAPA 58.01.01.105.01, 5/1/04~~

13.4. Within one year of the issuance of the Tier II operating permit, TASCOCO shall comply with the following permit conditions:

13.4.1 The provisions of Permit Conditions 6.6 and 6.8 shall be fully implemented.

13.4.2 All flue gases from the Riley boiler shall be exhausted to the atmosphere through the B&W boiler stack (Unit No. P-B1/2) after passing through the existing baghouse (Unit No. A-B3).

13.4.3 When the requirements of Permit Conditions 13.4.1 and 13.4.2 have been fulfilled, the permittee shall notify the Department in writing. The notification provided with respect to Permit Condition 13.4.1 shall include all relevant technical specifications and data from the baghouse manufacturer. The notification provided with respect to Permit Condition 13.4.2 shall include a schematic diagram of the final exhaust system routing for the B&W No. 1, B&W No. 2, and Riley boilers. The permittee shall notify the Department in writing of any delay or failure to meet the requirements of Permit Condition 13.4 as expeditiously as reasonably possible.

~~IDAPA 58.01.01.103.02, 5/1/04; IDAPA 58.01.01.105.01, 5/1/04~~

~~13.5 Within two years of the issuance of the Tier II operating permit, TASCOCO shall comply with the following permit conditions:~~

~~13.5.1 In accordance with IDAPA 58.01.01.201, the permittee shall submit a PTC application for the proposed steam dryer system (intended to replace the Center and North dryers). The application shall include technical parameters, including, but not limited to, operational requirements and rated capacity of the steam dryer system, schematic diagrams of the steam dryer system, and all information needed to calculate and/or verify emissions rates associated with the steam dryer system and all affected units.~~

~~13.5.2 Upon Department issuance of a PTC or exemption determination for the PTC application required by Permit Condition 13.5.1, the permittee shall install the best cleaning system required for operation of the steam dryer system.~~

**AIR QUALITY TIER II OPERATING PERMIT NUMBER: 027-00010**

**Permittee:** The Amalgamated Sugar Co. LLC  
**Location:** Nampa, Idaho

**Date Issued:** September 30, 2002  
**Date Expires:** September 30, 2007

~~13.5.3 When the requirements of Permit Condition 13.5.2 have been fulfilled, the permittee shall notify the Department in writing. The permittee shall notify the Department in writing of any delay or failure to meet the requirements of Permit Condition 13.5 as expeditiously as reasonably possible.~~

~~IDAAPA 58.04.04-100.02, 5/1/04; IDAPA 58.04.04-105.04, 5/1/04]~~

~~13.6 Within three years of the issuance of the Tier II operating permit, TASCO shall comply with the following permit conditions:~~

~~13.6.1 Upon Department issuance of a PTC or exemption determination for the PTC application required by Permit Condition 13.5.1, the permittee shall install the transformer evaporator and mill heaters required for operation of the steam dryer system.~~

~~13.6.2 When the requirements of Permit Condition 13.6.1 have been fulfilled, the permittee shall notify the Department in writing. The permittee shall notify the Department in writing of any delay or failure to meet the requirements of Permit Condition 13.5 as expeditiously as reasonably possible.~~

~~IDAAPA 58.04.04-100.02, 5/1/04; IDAPA 58.04.04-105.04, 5/1/04]~~

~~13.7 Within four years of the issuance of the Tier II operating permit, TASCO shall comply with the following permit conditions:~~

~~13.7.1 Upon Department issuance of a PTC or exemption determination for the PTC application required by Permit Condition 13.5.1, the permittee shall order and fabricate the steam dryer system.~~

~~13.7.2 When the requirements of Permit Condition 13.7.1 have been fulfilled, the permittee shall notify the Department in writing. The permittee shall notify the Department in writing of any delay or failure to meet the requirements of Permit Condition 13.7 as expeditiously as reasonably possible.~~

~~IDAAPA 58.04.04-100.02, 5/1/04; IDAPA 58.04.04-105.04, 5/1/04]~~

~~13.8 Within five years of the issuance of the Tier II operating permit, TASCO shall comply with the following permit conditions:~~

~~13.8.1 Upon Department issuance of a PTC or exemption determination for the PTC application required by Permit Condition 13.5.1, the permittee shall install and operate the steam dryer system.~~

~~13.8.2 The Center and North dryers shall permanently cease operation at the TASCO facility located in Nampa, Idaho.~~

~~13.8.3 When the requirements of Permit Conditions 13.8.1 and 13.8.2 have been fulfilled, the permittee shall notify the Department in writing. The permittee shall notify the Department in writing of any delay or failure to meet the requirements of Permit Conditions 13.8 as expeditiously as reasonably possible.~~

~~IDAAPA 58.01.01-103.02, 5/1/04; IDAPA 58.01.01-105.04, 5/1/04]~~

~~13.9 The permittee shall submit a Facility-wide Tier II operating permit application within 60 days of fulfilling the requirements of Permit Condition 13.8. The permit application shall include, at a minimum, updated process descriptions, including all changes implemented in accordance with Permit Conditions 13.8-13.9; updated information obtained by the performance testing requirements of this Tier II operating permit; and an updated facility-wide modeling analysis for all criteria pollutants. Thirty days prior to submission of the modeling analysis for Tier II operating permit application, the permittee shall submit a modeling protocol to the Department for approval.~~

~~IDAAPA 58.04.04-100.02, 5/1/04; IDAPA 58.04.04-104.04, 5/1/04; IDAPA 58.04.04-105.04, 5/1/04]~~

**AIR QUALITY TIER II OPERATING PERMIT NUMBER: 027-00010**

**Permittee:** The Amalgamated Sugar Co. LLC  
**Location:** Nampa, Idaho

**Date Issued:** September 30, 2002  
**Date Expires:** September 30, 2007

- 13.10 In the event that this Tier II operating permit should expire before the Department issues a renewed Tier II operating permit or before the requirements of Permit Conditions 13.3-13.9 are met by the permittee, TASC0 shall continue to comply with all the requirements contained in this Tier II operating permit until such time as the Department issues an updated Tier II operating permit for the facility.

[IDAPA 55.01.01.405.02, 5/4/04; IDAPA 55.01.01.405.04, 5/4/04]

- 13.11 Until such time that all of the compliance schedule permit conditions are completed, TASC0 shall submit a progress report each calendar quarter to the Department stating when each of the milestones and compliance with each condition in the compliance schedule were or will be achieved, and an explanation of why any dates were not or will not be met and a detailed description of any preventative or corrective measures undertaken by the permittee.

[IDAPA 55.01.01.405, 5/4/04]

~~43.40 Issuance of the Tier II operating permit with this schedule of compliance shall not relieve any owner or operator of the responsibility to comply with all applicable local, state, and federal rules and regulations.~~

[IDAPA 55.01.01.405, 5/4/04]

# AIR QUALITY TIER II OPERATING PERMIT NUMBER: 027-00010

Permittee: The Amalgamated Sugar Co. LLC  
Location: Nampa, Idaho

Date Issued: September 30, 2002  
Date Expires: September 30, 2007

## 14. SUMMARY OF EMISSIONS RATE LIMITS

Table 14.1 includes the emissions limits for which the facility must demonstrate compliance.

Table 14.1. SUMMARY OF ALLOWABLE EMISSIONS RATE LIMITS IN THE TIER II OPERATING PERMIT.

| TASSCO, Nampa<br>EMISSIONS Limits <sup>a</sup> Hourly (lb/hr), and Annual <sup>b</sup> (T/yr) |                  |       |                 |      |       |      |       |      |                 |      |
|-----------------------------------------------------------------------------------------------|------------------|-------|-----------------|------|-------|------|-------|------|-----------------|------|
| Source Description / Unit Number                                                              | PM <sub>10</sub> |       | NO <sub>x</sub> |      | CO    |      | VOC   |      | SO <sub>x</sub> |      |
|                                                                                               | lb/hr            | T/yr  | lb/hr           | T/yr | lb/hr | T/yr | lb/hr | T/yr | lb/hr           | T/yr |
| RAW No. 1 boiler / S-B1                                                                       |                  |       |                 |      |       |      |       |      |                 |      |
| RAW No. 2 boiler / S-B2                                                                       | 400.4            | 347.0 |                 |      | 50.4  | 43.6 |       |      |                 |      |
| Boilerhouse / S-B3                                                                            |                  |       |                 |      |       |      |       |      |                 |      |
| Unincinerator / S-B4                                                                          | 4.0              | 3.5   |                 |      | 4.0   | 3.5  |       |      |                 |      |
| Grain elevator / S-B1                                                                         | 10.4             | 9.0   |                 |      | 10.4  | 9.0  |       |      |                 |      |
| Grain elevator / S-B2                                                                         | 4.0              | 3.5   |                 |      | 4.0   | 3.5  |       |      |                 |      |
| Grain elevator / S-B3                                                                         | 4.0              | 3.5   |                 |      | 4.0   | 3.5  |       |      |                 |      |
| Grain elevator No. 4 / S-B4                                                                   |                  |       |                 |      |       |      |       |      |                 |      |
| Grain elevator No. 5 / S-B5                                                                   |                  |       |                 |      |       |      |       |      |                 |      |
| Grain elevator No. 6 / S-B6                                                                   | 4.0              | 3.5   |                 |      |       |      |       |      |                 |      |
| Grain elevator No. 7 / S-B7                                                                   |                  |       |                 |      |       |      |       |      |                 |      |
| Grain elevator No. 8 / S-B8                                                                   |                  |       |                 |      |       |      |       |      |                 |      |
| Asphalt mill / S-W1                                                                           | 4.0              | 3.5   |                 |      | 4.0   | 3.5  |       |      |                 |      |
| Blender / S-K2                                                                                | 0.1              | 0.1   |                 |      | 4.0   | 3.5  |       |      |                 |      |
| Asphalt process / S-K4                                                                        | 4.0              | 3.5   |                 |      |       |      |       |      |                 |      |
| Boiler / S-W1                                                                                 | 4.0              | 3.5   |                 |      |       |      |       |      |                 |      |
| No. 1 cooling water / S-W2                                                                    | 0.3              | 0.3   |                 |      |       |      |       |      |                 |      |
| No. 2 cooling water / S-W3                                                                    | 0.3              | 0.3   |                 |      |       |      |       |      |                 |      |
| Process No. 2 handling system / S-W4                                                          | 4.0              | 3.5   |                 |      |       |      |       |      |                 |      |
| Specialty handling system / S-W5                                                              | 4.0              | 3.5   |                 |      |       |      |       |      |                 |      |
| Packaging line handling system / S-W7                                                         | 4.0              | 3.5   |                 |      |       |      |       |      |                 |      |
| Wet kiln building / S-K3                                                                      | 4.0              | 3.5   |                 |      |       |      |       |      |                 |      |

<sup>a</sup> as determined by a pollutant specific EPA reference method, a Department approved alternative, or as determined by the Department's emissions estimation methods used in this permit analysis.

<sup>b</sup> as determined by multiplying the actual or alternative (if actual is not available) pounds per hour emissions rate by the allowable hours per year (not the process(es) only, special(s), or by actual annual production rates).

<sup>c</sup> includes condensates.



# AIR QUALITY TIER II OPERATING PERMIT NUMBER: 027-00010

Committee: The Amalgamated Sugar Co. LLC  
Location: Nampa, Idaho

Date Issued: September 30, 2002  
Date Expires: September 30, 2007

## 15. FACILITY WIDE EMISSIONS INVENTORY

Table 15.1 includes all potential emissions from all sources included in the Tier II application and Northern Ada County PM<sub>10</sub> SIP Plan Emissions Inventory. The emissions inventory table is provided for informational purposes only and reflects emissions rates after the compliance schedule is in place.

Table 15.1: EMISSIONS INVENTORY BASED ON POTENTIAL TO EMIT

| TASCO, Nampa<br>Potential Emissions <sup>a</sup> - Hourly (lb/hr), and Annual (T/yr)    |                  |              |                 |               |       |               |       |              |                 |               |
|-----------------------------------------------------------------------------------------|------------------|--------------|-----------------|---------------|-------|---------------|-------|--------------|-----------------|---------------|
| Source Description / Unit Number                                                        | PM <sub>10</sub> |              | NO <sub>x</sub> |               | CO    |               | VOC   |              | SO <sub>2</sub> |               |
|                                                                                         | lb/hr            | T/yr         | lb/hr           | T/yr          | lb/hr | T/yr          | lb/hr | T/yr         | lb/hr           | T/yr          |
| B&W No. 1 boiler / S-B1                                                                 | 28.4             | 124.2        | 104.6           | 458.1         | 3.2   | 13.8          | 0.4   | 1.9          | 220.5           | 965.8         |
| B&W No. 2 boiler / S-B2                                                                 | 28.4             | 124.2        | 104.6           | 458.1         | 3.2   | 13.8          | 0.4   | 1.9          | 220.6           | 965.8         |
| Riley boiler / S-B3                                                                     | 61.3             | 355.9        | 390.0           | 1708.2        | 30.0  | 131.4         | 1.3   | 5.6          | 632.5           | 2770.4        |
| Union boiler / S-B4                                                                     | 1.6              | 6.8          | 7.2             | 31.5          | 6.5   | 28.3          | 0.4   | 1.7          | 0.0             | 0.2           |
| South pulp dryer / S-D1                                                                 | 18.7             | 82.0         | 38.0            | 166.5         | 26.8  | 555.2         | 4.2   | 18.5         | 13.6            | 59.7          |
| Center pulp dryer / S-D2                                                                | 0.0              | 0.0          |                 |               | 0.0   | 0.0           | 4.2   | 18.5         |                 |               |
| North pulp dryer / S-D3                                                                 | 0.0              | 0.0          |                 |               | 0.0   | 0.0           | 1.6   | 7.1          |                 |               |
| Pellet mill No. 1 / S-D4                                                                | 0.1              | 0.5          |                 |               |       |               |       |              |                 |               |
| Pellet mill No. 2 / S-D5                                                                | 0.2              | 0.7          |                 |               |       |               |       |              |                 |               |
| Pellet mill No. 3 / S-D6                                                                | 0.2              | 0.7          |                 |               |       |               |       |              |                 |               |
| Pellet mill No. 4 / S-D7                                                                | 0.2              | 0.7          |                 |               |       |               |       |              |                 |               |
| Pellet mill No. 5 / S-D8                                                                | 0.1              | 0.5          |                 |               |       |               |       |              |                 |               |
| A Lime kiln / S-K1                                                                      | 0.1              | 0.4          | 1.4             | 6.1           | 685.1 | 3000.7        | 0.7   | 3.0          | 3.5             | 15.2          |
| B Lime kiln / S-K2                                                                      | 0.1              | 0.4          | 1.6             | 7.1           | 785.8 | 3485.6        | 0.8   | 3.5          | 4.0             | 17.7          |
| A and B process slakers / S-K4                                                          | 1.4              | 6.1          |                 |               |       |               |       |              |                 |               |
| Drying granulator / S-W1                                                                | 1.1              | 5.0          |                 |               |       |               |       |              |                 |               |
| No. 1 cooling granulator / S-W2                                                         | 0.3              | 1.3          |                 |               |       |               |       |              |                 |               |
| No. 2 cooling granulator / S-W3                                                         | 0.3              | 1.3          |                 |               |       |               |       |              |                 |               |
| Process No. 2 handling system / S-W4                                                    | 0.3              | 1.2          |                 |               |       |               |       |              |                 |               |
| Specialties handling system / S-W6                                                      | 0.1              | 0.6          |                 |               |       |               |       |              |                 |               |
| Packaging line handling system / S-W8                                                   | 0.2              | 0.9          |                 |               |       |               |       |              |                 |               |
| Lime kiln building / S-K3                                                               | 0.8              | 3.5          |                 |               |       |               |       |              |                 |               |
| A-side sulfur stove / S-O2                                                              |                  |              |                 |               |       |               |       |              | 2.1             | 9.2           |
| B-side sulfur stove / S-O3                                                              |                  |              |                 |               |       |               |       |              | 2.1             | 9.2           |
| Main mill / S-O1                                                                        |                  |              |                 |               |       |               | 11.2  | 48.9         |                 |               |
| Fugitives / F-D9, F-D10, F-O4,<br>F-O508a, F-O508b, F-O508c, F-O7,<br>F-O8, F-O9, F-O10 | n/a <sup>b</sup> | 35.0         |                 |               |       |               |       |              |                 |               |
| <b>TOTAL</b>                                                                            |                  | <b>717.0</b> |                 | <b>2835.6</b> |       | <b>7226.8</b> |       | <b>110.8</b> |                 | <b>4813.2</b> |

<sup>a</sup> as determined by a pollutant-specific EPA reference method, a Department-approved alternative, or as determined by the Department's emissions estimation methods used in this permit analysis.

<sup>b</sup> the hourly emissions rates of these sources vary by season; refer to Tier II application

**AIR QUALITY TIER II OPERATING PERMIT NUMBER: 027-00010**

**Permittee:** The Amalgamated Sugar Co. LLC  
**Location:** Nampa, Idaho

**Date Issued:** September 30, 2002  
**Date Expires:** September 30, 2007

**16. OTHER SOURCES**

Table 16.1 below identifies other air pollution-emitting sources (included in the Tier II application and Northern Ada County PM<sub>10</sub> SIP Plan Emissions Inventory) at the facility that do not require specific permit conditions to demonstrate compliance with applicable air quality standards.

Table 16.1: OTHER AIR POLLUTION SOURCES AT THE FACILITY

| Source Description                                                                                                                                                                                                                      |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Main mill / S-01                                                                                                                                                                                                                        |
| A-side sulfur stove / S-02                                                                                                                                                                                                              |
| B-side sulfur stove / S-03                                                                                                                                                                                                              |
| Fugitives (coal unloading, pulp and pellet loadout/storage, coal storage, bag handling, vehicle traffic on unpaved roads, lime rock handling, coke handling) / F-D9 and F-04, F-D10, F-0506a, F-0506b, F-0506c, F-07, F-08, F-09, F-010 |

**AIR QUALITY TIER II OPERATING PERMIT NUMBER: 027-00010**

**Permittee:** The Amalgamated Sugar Co. LLC  
**Location:** Nampa, Idaho

**Date Issued:** September 30, 2002  
**Date Expires:** September 30, 2007

**17. TIER II PERMIT GENERAL PROVISIONS**

1. All emissions authorized herein shall be consistent with the terms and conditions of this permit. 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.
2. The permittee shall at all times (except as provided in the Rules) maintain and operate in good working order all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
3. The permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
  - To enter upon the permittee's 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; and
  - 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 to require stack emissions testing (i.e., performance tests) in conformance with state-approved or accepted EPA procedures when deemed appropriate by the Director.
4. Except for data determined to be confidential under Section 9-342A Idaho Code, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Department.
5. 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.
6. In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter; a copy of which shall be forwarded to the Director.
7. This permit shall be renewable on the expiration date, provided the permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within 60 days after receipt of the Director's request shall cause the permit to become void.
8. The Director may require the permittee to develop a list of operation and maintenance procedures to be approved by the Department. Such list of procedures shall become a part of this permit by reference, and the permittee shall adhere to all of the operation and maintenance procedures contained therein.
9. 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.

STATE OF IDAHO  
AIR POLLUTION  
OPERATING PERMIT

GENERAL INFORMATION

PERMIT NUMBER

777 - 00182

AQCR

063

CLASS

B

SIC

3273

ZONE

11

UTM COORDINATE (km)

533

9

5347

2

1. PERMITTEE

Lake Pre-Mix Concrete

2. PROJECT

Johnson 630 Portable Concrete Batch Plant

3. ADDRESS

P.O. Box 1356

TELEPHONE #

(208) 263-5000

COUNTY

Bonner

4. CITY

Sandpoint

STATE

Idaho

ZIP CODE

83864

5. PERSON TO CONTACT

Steve Lafrenz

TITLE

President

6. EXACT PLANT LOCATION

Portable, excluding the downtown area of Sandpoint, Idaho

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Concrete Batch Plant

8. GENERAL CONDITIONS

This permit is issued according to the Rules for the Control of Air Pollution in Idaho, Section 16.01.01.400 and pertains only to emissions of air contaminants which are regulated by the State of Idaho and to the sources specifically allowed to be operated by this permit.

THIS PERMIT HAS BEEN GRANTED ON THE BASIS OF OPERATION AND DESIGN INFORMATION PRESENTED MADE AVAILABLE TO THE DEPARTMENT. CHANGES IN DESIGN, OPERATION, OR EQUIPMENT, THAT RESULT IN ANY CHANGE IN THE NATURE OR AMOUNT OF EMISSIONS, MUST BE APPROVED IN ADVANCE BY THE DEPARTMENT.

*(Signature)*  
ASSISTANT ADMINISTRATOR  
DIVISION OF ENVIRONMENTAL QUALITY

ISSUED MAY 17, 1996

DATE

DATE



## AIR POLLUTION OPERATING PERMIT

PERMIT NUMBER

## PERMITTEE AND LOCATION

Lake Pre-Mix Concrete  
 Portable Concrete Batch Plant  
 Sandpoint, Idaho

777 - 00182

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

## SOURCE

Johnson 630 Portable Concrete Batch Plant

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

## 1. MONITORING REQUIREMENTS

3.1 Concrete Throughput Monitoring3.1.1 Winter Operations

The Permittee shall monitor and record the concrete throughput rate once per day to demonstrate compliance with section 2.1.1 of this permit. The amount shall be recorded as cubic yards per day (cy/day) in a log kept at the facility for the most recent two (2) year period. The log shall be made available to Department representatives upon request.

ISSUED: MAY 17, 1996

## PERMITTEE AND LOCATION

Lake Pre-Mix Concrete  
Portable Concrete Batch Plant  
Sandpoint, Idaho

PERMIT NUMBER

$$\begin{array}{|c|c|c|} \hline 7 & 7 & 7 \\ \hline \end{array} - \begin{array}{|c|c|c|c|c|} \hline 0 & 0 & 1 & 8 & 2 \\ \hline \end{array}$$

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

**SOURCE**

### Johnson 630 Portable Concrete Batch Plant

### 3.1.2 Summer Operations

The Permittee shall monitor and record the concrete throughput rate once per day to demonstrate compliance with Section 2.1.2 of this permit. The amount shall be recorded as cubic yards per day (cy/day) in a log kept at the facility for the most recent two (2) year period. The log shall be made available to Department representatives upon request.

ISSUED: MAY 17, 1996

ISSUED: MAY 17, 1996

SR:jfj.../permit/lakepre/latepre..



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

STATE OF IDAHO

AIR POLLUTION  
OPERATING PERMIT

## GENERAL INFORMATION

## PERMIT NUMBER

0 1 7 - 0 0 0 4 8

AQCR

0 6 3

CLASS

A 2

SIC

3 2 7 3

ZONE

1 1

UTM COORDINATE (km)

5 3 2 6 5 3 4 8 1

## 1. PERMITTEE

Interstate Concrete and Asphalt

## 2. PROJECT

Asphalt Batch Plant and Concrete Batch Plant

## 3. MAILING ADDRESS

P.O. Box 1113

## TELEPHONE #

(208) 263-5615

## COUNTY

Bonner

## 4. CITY

Sandpoint

## STATE

Idaho

## ZIP CODE

83864

## 5. PERSON TO CONTACT

Larry Peak

## TITLE

Sandpoint Facility Manager

## 6. EXACT PLANT LOCATION

1/4 mile west of Bover Road on north side of Baldy Road

## 7. GENERAL NATURE OF BUSINESS &amp; KINDS OF PRODUCTS

Paving Contractor producing various mixes of asphalt, concrete, and various sizes of aggregate.

## 8. PERMIT AUTHORITY

This permit is issued according to the Rules for the Control of Air Pollution in Idaho, Section 16.01.01.400 and pertains only to emissions of air contaminants which are regulated by the State of Idaho and to the sources specifically allowed to be operated by this permit.

THIS PERMIT HAS BEEN GRANTED ON THE BASIS OF DESIGN INFORMATION PRESENTED IN THE APPLICATION AND DIVISION OF ENVIRONMENTAL QUALITY'S (DEQ) TECHNICAL ANALYSIS OF THE SUPPLIED INFORMATION. CHANGES IN DESIGN OR EQUIPMENT, THAT RESULT IN ANY CHANGE IN THE NATURE OR AMOUNT OF EMISSIONS, MAY BE A MODIFICATION. MODIFICATIONS ARE SUBJECT TO DEQ REVIEW IN ACCORDANCE WITH SECTION 16.01.01.200 OF THE RULES FOR THE CONTROL OF AIR POLLUTION IN IDAHO.

ISSUED DATE August 2, 1999

*Dwight D. Green*

ADMINISTRATOR, STATE AIR QUALITY PROGRAM

DIVISION OF ENVIRONMENTAL QUALITY

Interstate Concrete and Asphalt  
Tier II Operating Permit  
Sandpoint, Idaho

PERMIT NUMBER

|   |   |   |   |   |   |   |   |   |
|---|---|---|---|---|---|---|---|---|
| 0 | 1 | 7 | - | 0 | 0 | 0 | 4 | 8 |
|---|---|---|---|---|---|---|---|---|

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

**SOURCE**

### Asphalt Batch Plant and Concrete Batch Plant

[REDACTED]

[REDACTED] b7C  
[REDACTED]  
[REDACTED] Dr.  
[REDACTED]  
[REDACTED]  
[REDACTED] shall be around the three (3) material drop points in the above [REDACTED]'s

[REDACTED] Natural gas produced [REDACTED]  
[REDACTED]  
[REDACTED] Rated heat capacity is 80,000 Btu per gallon [REDACTED] red  
[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] n  
[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] of  
[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] part  
[REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] re

[REDACTED] Each bag is six (6) inches in [REDACTED]  
[REDACTED]  
[REDACTED] The [REDACTED] drop of 0.5

AIR POLLUTION OPERATING PERMIT  
 PERMITTEE, PROJECT, AND LOCATION

Interstate Concrete and Asphalt  
 Tier II Operating Permit  
 Sandpoint, Idaho

PERMIT NUMBER

017 - 00048

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

SOURCE

Asphalt Batch Plant and Concrete Batch Plant

2. EMISSION LIMITS

- 2.2 Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers ( $PM_{10}$ ) shall not exceed the pound per hour (lb/hr) and ton per year (T/yr) values listed in Appendix A.

3. OPERATING REQUIREMENTS

3.1 Maximum Throughput

- 3.1.1 The maximum hourly throughput shall be limited to the ton per hour (T/hr), ton per day (T/day), and ton per year (T/yr) limitations in Appendix B.

4. TESTING AND MONITORING REQUIREMENTS

4.1 Throughput Log

The following information shall be recorded and maintained on site for the most recent two (2) year period.

- 4.1.1 Amount (tons per hour and tons per day) of hot mix asphalt produced by the facility.  
 4.1.2 Amount (standard cubic feet per day) of natural gas burned in the Barber Greene drum dryer.

4.2 Performance Tests

- 4.2.1 The Permittee shall conduct a performance test at a frequency of no less than once every year to demonstrate compliance with [REDACTED] the hourly  $PM_{10}$  emission limit in Appendix A. The permittee may show compliance with the hourly emission limit  $PM_{10}$  by conducting a performance test to measure Total Suspended Particulate (TSP) emissions from the Drum Dryer baghouse using EPA Reference Method 5 and 202 back half catch analysis. The resulting pound per hour (lb/hr) emission rate demonstrated by the source test shall be

ISSUED DATE:

August 2, 1999

**AIR POLLUTION OPERATING PERMIT  
PERMITTEE, PROJECT, AND LOCATION**

Interstate Concrete and Asphalt  
Tier II Operating Permit  
Sandpoint, Idaho

PERMIT NUMBER .

017 - 00048

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

## SOURCE

### Asphalt Batch Plant and Concrete Batch Plant

multiplied by a factor of 0.40 to establish the hourly PM<sub>10</sub> emission rate. The Permittee shall have the option of performing a Method 201 or 201A performance test with Method 202 Analysis on the drum dryer baghouse stack. [REDACTED]

**4.2.2** During performance testing, the following data shall be recorded:

**4.2.2.1 Process weight rate (tons of asphalt produced per hour).**

4.2.2.2 Burner fuel flow rate (i.e., cubic feet per hour).

#### 4.2.2.3 Change in pressure drop across the baghouse.

ISSUED DATE:

August 2, 1995

Things

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**AIR POLLUTION OPERATING PERMIT  
 PERMITTEE, PROJECT, AND LOCATION**

 Interstate Concrete and Asphalt  
 Tier II Operating Permit  
 Sandpoint, Idaho

**PERMIT NUMBER**

017 - 00048

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

**SOURCE**

Asphalt Batch Plant and Concrete Batch Plant

ISSUED DATE: August 2, 1999

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**AIR POLLUTION OPERATING PERMIT  
PERMITTEE, PROJECT, AND LOCATION**

Interstate Concrete and Asphalt  
Tier II Operating Permit  
Sandpoint, Idaho

**PERMIT NUMBER**

017 - 00048

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

**SOURCE**

Asphalt Batch Plant and Concrete Batch Plant

[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]  
[REDACTED]

ISSUED DATE: August 2, 1999

Title: G:\AHW\LUNDAHL\ICA-MOD2.PMT

**AIR POLLUTION OPERATING PERMIT  
PERMITTEE, PROJECT, AND LOCATION**

Interstate Concrete and Asphalt  
Tier II Operating Permit  
Sandpoint, Idaho

**PERMIT NUMBER**

0 1 7 - 0 0 0 4 8

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

**SOURCE**

Asphalt Batch Plant and Concrete Batch Plant

**2. EMISSION LIMITS**

- 2.1 Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers ( $PM_{10}$ ) emissions shall not exceed the pound per hour (lb/hr) and ton per year (T/yr) values listed in Appendix A.

[REDACTED]

**3. OPERATING REQUIREMENTS**

3.1 Maximum Throughput

- 3.1.1 Process throughput of materials for the operation of the concrete batch plant shall be limited to quantities specified in Appendix B.

**4. MONITORING REQUIREMENTS**

4.1 Throughput Log

The following information shall be recorded weekly and maintained on site for the most recent two (2) year period.

- 4.1.1 Amount in cubic yards per day ( $yd^3/day$ ) of concrete hauled off-site from the facility.

- 4.1.2 Amount in tons per day (T/day) of raw aggregate hauled out of the facility.

[REDACTED]

[REDACTED]

[REDACTED]

ISSUED DATE: August 2, 1999

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**AIR POLLUTION OPERATING PERMIT  
PERMITTEE, PROJECT, AND LOCATION**

Interstate Concrete and Asphalt  
Tier II Operating Permit  
Sandpoint, Idaho

**PERMIT NUMBER:**

017 - 00048

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

**SOURCE**

Asphalt Batch Plant and Concrete Batch Plant

ISSUED DATE:

August 2, 1999

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**AIR POLLUTION OPERATING PERMIT  
PERMITTEE, PROJECT, AND LOCATION**

Interstate Concrete and Asphalt  
Tier II Operating Permit  
Sandpoint, Idaho

**PERMIT NUMBER**

017 - 00048

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

**SOURCE**

Asphalt Batch Plant and Concrete Batch Plant

**MONITORING REQUIREMENTS**

1.1.1 The Permittee shall maintain a continuous record of the following information for each application of EOCDS:

1.1.1.1 Date of application

1.1.1.2 Emission rate (volume of water relative to EOCDS) to be used in the application of EOCDS solution (volume of water relative to EOCDS)

1.1.1.3 Application intensity (gallons per square yard (gpy)) of the EOCDS solution for each projected treatment area.

1.1.1.4 Facility plot plan showing the proposed treatment area.

**1.1.2 EOCDS Application Log**

The Permittee shall maintain a log of the following information for each application of EOCDS:

1.1.2.1 Date and time of application

1.1.2.2 Emission rate (volume of water relative to EOCDS) to be used in the application of EOCDS solution

1.1.2.3 Date of EOCDS solution application

1.1.2.4 Application intensity (gpy) of the EOCDS solution

1.1.2.5 Facility plot plan showing the proposed treatment area

1.1.2.6 Name of the person responsible for the application of EOCDS solution

**1.1.3 Road Closure/Ingress Log**

1.1.3.1 The Permittee shall maintain a log of the following information for each application of EOCDS:

1.1.3.1.1 Date and time of application

1.1.3.1.2 Date and time of application

1.1.3.1.3 Name of the person responsible for the application of EOCDS solution

ISSUED DATE: August 2, 1999

EXPIRATION DATE: August 2, 2000

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**AIR POLLUTION OPERATING PERMIT  
PERMITTEE, PROJECT, AND LOCATION**

Interstate Concrete and Asphalt  
Tier II Operating Permit  
Sandpoint, Idaho

**PERMIT NUMBER**

017 - 00048

The Permittee is hereby allowed to operate the equipment described herein subject to the emission limits and monitoring and reporting requirements specified in this permit.

**SOURCE**

Asphalt Batch Plant and Concrete Batch Plant

ISSUED DATE: August 2, 1999

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# APPENDIX A

## Interstate Concrete & Asphalt

### Emission Limits\* - Hourly (lb/hr) and Annual\* (T/yr)

| SOURCE DESCRIPTION                       |  |  |  |  | PM10*<br>(T/yr)<br>after<br>7/1/86 <sup>d</sup> | PM10*<br>(lb/hr)<br>after<br>7/1/86 <sup>d</sup> |  |  |  |  |
|------------------------------------------|--|--|--|--|-------------------------------------------------|--------------------------------------------------|--|--|--|--|
| ASPHALT PLANT                            |  |  |  |  |                                                 |                                                  |  |  |  |  |
| Drum Dryer                               |  |  |  |  | 2.3                                             | 0.81                                             |  |  |  |  |
| Vehicle Fugitives<br>(Paved and Unpaved) |  |  |  |  | 0.71                                            | 0.30                                             |  |  |  |  |
| Process Fugitives                        |  |  |  |  | 0.26                                            | 0.58                                             |  |  |  |  |
| CONCRETE PLANT                           |  |  |  |  | 0.08                                            | 0.04                                             |  |  |  |  |
| Cement Silo Vents                        |  |  |  |  |                                                 |                                                  |  |  |  |  |
| Process Fugitives                        |  |  |  |  | 0.83*                                           | 1.1*                                             |  |  |  |  |
| Vehicle Fugitives<br>(Paved and Unpaved) |  |  |  |  | 0.89                                            | 0.34                                             |  |  |  |  |

a As determined by a pollutant specific U.S. EPA reference method, or Department approved alternative, or as determined by the Department's emission estimation methods used in this permit analysis.

b As determined by multiplying the actual or allowable (if actual is not available) pound per hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

c Includes condensables.

d Or such earlier date as all required Conditional Control Measures have been completed.

e Includes point source emissions for the two (2) minibaghouses placed on the cement weigh hoppers and the scavenge fan/baghouse system on the mixer loading operation installed as Conditional Control Measures.

ISSUED DATE: August 2, 1999

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# APPENDIX B

## Interstate Concrete and Asphalt

### Maximum Throughput Values at Fugitive Emission Sources

| Source Description                                             | Material Handled | Hourly (T/hr) after 7/1/98* | Daily (T/day) after 7/1/98* | Annual (T/yr) after 7/1/98* |
|----------------------------------------------------------------|------------------|-----------------------------|-----------------------------|-----------------------------|
| 1. Asphalt Plant                                               | Asphalt          | 200*                        | 2,400                       | 140,000                     |
| 2. Concrete Batch Plant<br>yd3/time period                     | Concrete         | 75                          | 1,400                       | 70,000                      |
| 3. Retail Aggregate Concrete Plant<br>End Loader and PG Hopper | Aggregate        |                             | 1,700                       | 55,000                      |

a) Or such earlier date as all required Conditional Control Measures have been completed.

b) Operation at this production rate shall require a successful performance test against the PM emission limit, as required in 4.2 of the Asphalt Plant section of this permit.

ISSUED DATE: August 2, 1999

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

STATE OF IDAHO  
DEPARTMENT OF HEALTH AND WELFARE  
DIVISION OF ENVIRONMENT

Pursuant to the Provisions  
of Section 39-115 of the Idaho Code,  
and the Rules and Regulations for the Con-  
trol of Air Pollution in Idaho,

Whiteman Lumber Company  
Permittee, including affiliates, if any

Cataldo,  
Located at

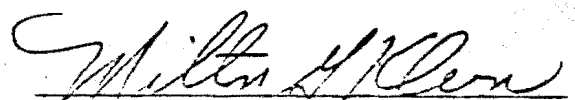
Idaho 83810

is hereby granted permission to operate the Air  
Pollution Source(s) and Control Equipment specified  
herein provided the emission limitations, monitoring  
requirements and other conditions set forth in the  
Source Permit(s) are complied with.

Validation:

Issued 7/16/79

Expiration 7/15/84

  
Director

PART I

SOURCE PERMIT NO. 13-1420-062

Page 2 of 8

Whiteman Lumber Company located <sup>near</sup> Cataldo, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment: Sawmill with associated wigwam  
burner and mill cyclones.

Restrictions:

| Emission Point | Emission Characteristic | Emission Limitations                                                           | Monitoring Requirements               |
|----------------|-------------------------|--------------------------------------------------------------------------------|---------------------------------------|
| Wigwam Burner  | Visible Emissions       | <20% Opacity Except for 3 Minutes in any 60 minute period.* Manual Sec. 1-1702 | Continuous Temper. Monitor and Recor. |
| Cyclones       | Visible Emissions       | <20% Opacity Except for 3 Minutes in any 60 Minute Period.* Manual Sec. 1-1902 | Annual Compliance Observation         |

\* Except For A Start-up Period Of:  
One Hour; November 1 - May 1  
One-Half Hour; May 1 - November 1

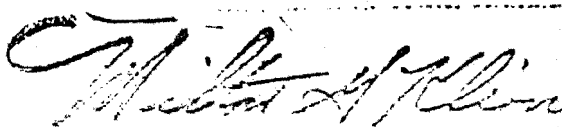
Conditions:

Submit report of burner temperature on a quarterly basis.

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

— Expiration 1/1/83





PART I

SOURCE PERMIT NO. 13-1420-062

Page 3 of 8

Whiteman Lumber Company located <sup>near</sup> Cataldo, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment: Sawmill with associated wigwam burner  
and cyclones.

Restrictions:

| Emission Point | Emission Characteristic | Emission Limitations                                                                                              | Monitoring Requirements                     |
|----------------|-------------------------|-------------------------------------------------------------------------------------------------------------------|---------------------------------------------|
| Wigwam Burner  | Visible Emissions       | <20% Opacity Except For 3 Minutes In Any 60 Minute Period.* Manual Sec. 1-1702                                    | Continuous Temperature Monitor and Recorder |
| Wigwam Burner  | Design Features         | (a) Air Tight Shell<br>(b) Forced Underfire Air<br>(c) Forced Overfire Air<br>(d) Top Damper - Manual Sec. 1-1703 | Certification Of Requirement Accomplishment |
| Cyclones       | Visible Emissions       | <20% Opacity Except For 3 Minutes In Any 60 Minute Period. Manual Sec. 1-1902                                     | Annual Compliance Observation               |

\* Except For A Start-up Period Of:  
One Hour; November 1 - May 1  
One Half Hour; May 1 - November 1

Conditions:

Submit reports of burner temperature, and repair and maintenance schedule on a quarterly basis.

Validation (if different from Facility Permit)

Effective 1/1/83

Expiration \_\_\_\_\_

*M. L. H. Kline*

PART I

SOURCE PERMIT NO. 13-1420-062

Page 4 of 8

Whiteman Lumber Company located <sup>near</sup> Cataldo, Idaho

is hereby granted permission to operate the following air pollution  
source or control equipment: A log yard.

Restrictions:

| Emission Point                                          | Emission Characteristic | Emission Limitations                                                                                                                                                                                                                                  | Monitoring Requirements                              |
|---------------------------------------------------------|-------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------|
| Plant Roads, Loading and Unloading Areas, Storage Areas | Fugitive Dust           | Compliance With Manual Sec. 1-1251 Of the <u>Rules and Regulations For the Control of Air Pollution in Idaho</u> Manual. Include All Reasonable Precautions To Prevent Particulate Matter From Becoming Airborne As Described In Attached Appendix A. | Quarterly Repo Of Measures Wh Have Been Implemented. |

Conditions:

See Appendix A

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_

*Milton H. Klein*

APPENDIX A

- 1) All haul roads, access roads and traffic patterns shall be paved, oiled, or watered at least twice daily during the operating season unless wet because of natural precipitation, in order to control fugitive dust.
- 2) All paved areas on the plant grounds shall be maintained in a dust-free condition by wet sweeping or equivalent methods. The removal of dust shall be accomplished at least weekly during the operating season and more frequently if required because of excessive dust accumulation and dry weather.
- 3) All permittee-owned or operated open-bodied trucks transporting fugitive dust generating materials to or from the plant location shall be covered at all times while in motion on public roads.

## PART II GENERAL PROVISIONS

- A All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant identified in this permit in excess of that authorized, or non-compliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules and Regulations 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 by breakdowns as defined in the Rules and Regulations 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 laws.
- C The permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
- 1) To enter upon the permittee's 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 equipment or monitoring method required in this permit, and to sample any emission of pollutants.
- D Except for data determined to be confidential under section 39-111, Idaho Code, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Division of Environment.
- E Nothing in this permit shall be construed to preclude institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties established pursuant to any applicable federal, state, or local law or regulation.
- F In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Director.

- 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.
- H Until the expiration date, this permit shall be renewable annually, provided the permittee submits any and all information required by the Director to assess the air pollution impact of the equipment for which the permit is granted. Failure to submit such information within sixty (60) days after receipt of the Director's request shall cause the permit to be voided.
- I The Department may require the permittee to develop an Operational and Maintenance Manual which must be approved by the Director. Such Manual shall become a part of this permit by reference, and failure to comply with the terms of the Manual shall constitute a violation of this permit.
- J The permittee shall provide the appropriate regional office a minimum of five (5) days notice prior to conducting any compliance tests required pursuant to this permit. Any records or data generated as a result of such compliance tests shall be made available to the Department upon request.

STATE OF IDAHO  
DEPARTMENT OF HEALTH AND WELFARE  
DIVISION OF ENVIRONMENT

Pursuant to the Provisions  
of Section 39-115 of the Idaho Code,  
and the Rules and Regulations for the Con-  
trol of Air Pollution in Idaho,

POTLATCH CORPORATION - PULP & PAPER UNIT  
Permittee, including affiliates, if any

P.O. BOX 1016  
Located at

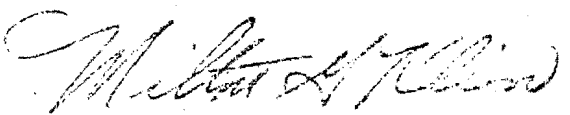
LEWISTON, IDAHO

is hereby granted permission to operate the Air  
Pollution Source(s) and Control Equipment specified  
herein provided the emission limitations, monitoring  
requirements and other conditions set forth in the  
Source Permit(s) are complied with.

Validation:

Issued July 5, 1979

Expiration January 1, 1984

  
Director

## PART I

SOURCE PERMIT NO. 13-1140-0001-04Page 2 of 19POTLATCH CORPORATION  
PULP & PAPER UNITlocated at LEWISTON, IDAHO

is hereby granted permission to operate the following air pollution  
source or control equipment: THEIR FOSSIL FIRED POWER BOILERS NO.  
1, 2 AND 3 WITH ASSOCIATED BREECHINGS AND STACKS.

## Restrictions:

| Emission Point | Emission Characteristic | Emission Limitations                                                                             | Monitoring Requirements                         |
|----------------|-------------------------|--------------------------------------------------------------------------------------------------|-------------------------------------------------|
| STACK          | PARTICULATES            | 0.050 GR/DSCF,<br>CORRECTED TO 8%<br>O <sub>2</sub> (≈0.1 LB/10 <sup>6</sup><br>BTU) RULE 1-1320 | LOG OF AMOUNT AND<br>TIME OF FUEL OIL<br>USEAGE |
|                | VISIBLE EMISSIONS       | <20% OPACITY EX-<br>CEPT FOR 3 MIN-<br>UTES IN ANY 60<br>MINUTE PERIOD<br>RULE 1-1202            |                                                 |

## Conditions:

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_

  
\_\_\_\_\_  
Authorizing Signature



## PART I

SOURCE PERMIT NO. 13-1140-0001

Page 3 of 19

POTLATCH CORPORATION  
PULP & PAPER UNIT

located at LEWISTON, IDAHO

is hereby granted permission to operate the following air pollution source or control equipment: THEIR NO. 1 KRAFT PROCESS RECOVERY FURNACE WITH ASSOCIATED DIRECT CONTACT EVAPORATOR AND ELECTROSTATIC PRECIPITATORS (ESP)

## Restrictions:

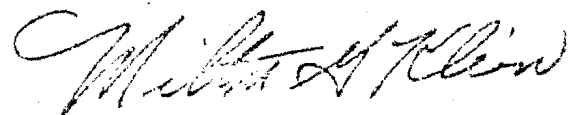
| Emission Point | Emission Characteristic | Emission Limitations                                                                        | Monitoring Requirements                    |
|----------------|-------------------------|---------------------------------------------------------------------------------------------|--------------------------------------------|
| ESP            | PARTICULATES            | 0.080 GR/DSCF CORRECTED TO 8% O <sub>2</sub> (~2.0 LB/ADT) (MAX. DAILY AVERAGE) RULE 1-1902 | MONTHLY SOURCE TEST USING IDAHC PROCEDURES |
|                | VIS. EMISSIONS          | 20% OPACITY EXCEPT FOR 3 MINUTES IN ANY 60 MIN. PER.                                        | CONTINUOUS MONITORING AND RECORDING        |
|                | TRS                     | 15 PPM (MAX. DAILY AVG) RULE 1-1902                                                         | CONTINUOUS MONITORING AND RECORDING        |

## Conditions:

- 1) SUBMIT A QUARTERLY REPORT OF TESTING RESULTS WITH ALL VALUES EXCEEDING LIMITS SPECIFIED IN THIS PERMIT SUMMARIZED WITH CORRECTIVE PROCEDURES TAKEN FOR EACH OCCURRENCE.
- 2) SUBMIT A COPY OF THE ESP ROUTINE MONITORING AND MAINTENANCE PROCEDURES, INCLUDING METHODS TO ASCERTAIN WHICH ELECTRODES ARE IN PLACE AND MAINTAINING OPTIMUM SPARKING RATE. SUMMARY REPORT OF MAINTENANCE SHALL BE SUBMITTED SEMI-ANNUALLY.

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration August 1, 1979

Authorizing Signature

PART I

SOURCE PERMIT NO. 13-1140-0001

Page 4 of 19

POTLATCH CORPORATION  
PULP & PAPER UNIT

located at LEWISTON, IDAHO

is hereby granted permission to operate the following air pollution  
source or control equipment: THEIR NO. 1 KRAFT PROCESS RECOVERY  
FURNACE WITH ASSOCIATED DIRECT CONTACT EVAPORATOR AND ELECTROSTATIC  
PRECIPITATORS (ESP)

Restrictions:

| Emission<br>Point | Emission<br>Characteristic | Emission<br>Limitations                                                                                   | Monitoring<br>Requirements                       |
|-------------------|----------------------------|-----------------------------------------------------------------------------------------------------------|--------------------------------------------------|
| ESP               | PARTICULATES               | 0.040 GR/DSCF COR-<br>RECTED TO 8% O <sub>2</sub><br>(~2.0 LB/ADT) (MAX.<br>DAILY AVERAGE)<br>RULE 1-1902 | MONTHLY SOURCE<br>TEST USING IDAHC<br>PROCEDURES |
|                   | VISIBLE EMISSIONS          | 20% OPACITY EXCEPT<br>FOR 3 MINUTES IN<br>ANY 60 MIN. PER.<br>RULE 1-1902                                 |                                                  |
|                   | TRS                        | 15 PPM (MAX.<br>DAILY AVERAGE)<br>RULE 1-1902                                                             |                                                  |

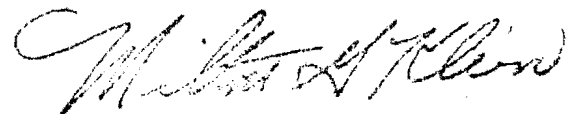
Conditions:

- 1) SUBMIT A QUARTERLY REPORT OF TESTING RESULTS WITH ALL VALUES EXCEEDING LIM SPECIFIED IN THIS PERMIT SUMMARIZED WITH CORRECTIVE PROCEDURES TAKEN FOR EACH OCCURRENCE.
- 2) SUBMIT A COPY OF THE ESP ROUTINE MONITORING AND MAINTENANCE PROCEDURES, INCLUDING METHODS TO ASCERTAIN WHICH ELECTRODES ARE IN PLACE AND MAINTAINING OPTIMUM SPARKING RATE. SUMMARY REPORT OF MAINTENANCE SHALL BE SUBMITTED SEMI-ANNUALLY

Validation (if different from Facility Permit)

Effective Date August 1, 1979

Expiration \_\_\_\_\_



Authorizing Signature

## PART I

SOURCE PERMIT NO. 13-1140-0001-01.Page 5 of 19POTLATCH CORPORATION  
PULP AND PAPER UNITlocated at LEWISTON, IDAHO

is hereby granted permission to operate the following air pollution source or control equipment: THEIR NO. 2 KRAFT PROCESS RECOVERY FURNACE WITH ASSOCIATED DIRECT CONTACT EVAPORATOR AND ELECTROSTATIC PRECIPITATOR (ESP).

## Restrictions:

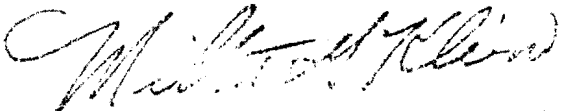
| Emission Point | Emission Characteristic | Emission Limitations                                                                    | Monitoring Requirements              |
|----------------|-------------------------|-----------------------------------------------------------------------------------------|--------------------------------------|
| ESP            | PARTICULATES            | 0.070 GR/DSCF CORRECTED TO 8% O <sub>2</sub> (23.0 LB/ADT) (MAX. DAILY AVG) RULE 1-1902 | MONTHLY SOURCE TEST IDAHO PROCEDURES |
|                | VIS. EMISSIONS          | 40% OPACITY EXCEPT FOR 3 MIN. IN ANY 60 MIN. PER. RULE 1-1902                           | CONTINUOUS MONITORING AND RECORDING  |
|                | TRS                     | 17.5 PPM (MAX. DAILY AVG) (RULE 1-1655)                                                 | CONTINUOUS MONITORING AND RECORDING  |

## Conditions:

- 1) SUBMIT A QUARTERLY REPORT OF TESTING RESULTS WITH ALL VALUES EXCEEDING LIMIT SPECIFIED IN THIS PERMIT SUMMARIZED WITH CORRECTIVE PROCEDURES TAKEN FOR EACH OCCURRENCE.
- 2) SUBMIT A COPY OF THE ESP ROUTINE MONITORING AND MAINTENANCE PROCEDURES, INCLUDING METHODS TO ASCERTAIN WHICH ELECTRODES ARE IN PLACE AND MAINTAINING AN OPTIMUM SPARKING RATE FOR ALL SECTIONS. SUMMARY REPORT OF MAINTENANCE SHALL BE SUBMITTED SEMI-ANNUALLY.

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration August 31, 1980  
\_\_\_\_\_  
Authorizing Signature

## PART I

SOURCE PERMIT NO. 13-1140-0001-01Page 6 of 19POTLATCH CORPORATION  
PULP AND PAPER UNITlocated at LEWISTON, IDAHO

is hereby granted permission to operate the following air pollution source or control equipment: THEIR NO. 2 KRAFT PROCESS FURNACE WITH ASSOCIATED DIRECT CONTACT EVAPORATOR AND ELECTROSTATIC PRECIPITATOR (ESP)

## Restrictions:

| Emission Point | Emission Characteristic | Emission Limitations                                                                       | Monitoring Requirements                    |
|----------------|-------------------------|--------------------------------------------------------------------------------------------|--------------------------------------------|
| ESP            | PARTICULATES            | 0.060 GR/SDCF CORRECTED TO 8% O <sub>2</sub> (~3.0 LB/ADT) (MAX. DAILY AVG)<br>RULE 1-1902 | MONTHLY SOURCE TEST USING IDAHO PROCEDURES |
|                | VIS. EMISSIONS          | 35% OPACITY EXCEPT 3 MIN. IN ANY 60 MIN. PER. RULE 1-1902                                  | CONTINUOUS MONITORING AND RECORDING        |
|                | TRS                     | 17.5 PPM (MAX. DAILY AVG)<br>RULE 1-1655                                                   | CONTINUOUS MONITORING AND RECORDING        |

## Conditions:

- 1) SUBMIT QUARTERLY REPORT OF TESTING RESULTS WITH ALL VALUES EXCEEDING LIMIT SPECIFIED IN THIS PERMIT SUMMARIZED WITH CORRECTIVE PROCEDURES TAKEN FOR EACH OCCURRENCE.
- 2) SUBMIT A COPY OF THE ESP ROUTINE MONITORING AND MAINTENANCE PROCEDURES, INCLUDING METHODS TO ASCERTAIN WHICH ELECTRODES ARE IN PLACE AND MAINTAINING AN OPTIMUM SPARKING RATE FOR ALL SECTIONS. SUMMARY REPORT OF MAINTENANCE SHALL BE SUBMITTED SEMI-ANNUALLY.

Validation (if different from Facility Permit)

Effective Date September 1, 1980

Expiration \_\_\_\_\_

  
\_\_\_\_\_  
Authorizing Signature

Potlatch Corporation  
Pulp and Paper Unit

located near Lewiston, Idaho

is hereby granted permission to operate the following air pollution source or control equipment; Their No. 3 Kraft Process Recovery Furnace with associated direct contact evaporator and electrostatic precipitator (ESP)

Restrictions:

| Emission Point | Emission Characteristic | Emission Limitations                                                                   | Monitoring Requirements                    |
|----------------|-------------------------|----------------------------------------------------------------------------------------|--------------------------------------------|
| ESP            | Particulates            | 0.03 GR/SDCF Corrected to 8% O <sub>2</sub> (-3.7 LB/ADT) (MAX. DLY. AVG) Rules 1-1902 | Monthly Source Test Using Idaho Procedures |
|                | Visible Emissions       | 40% opacity except 3 min. in any 60 min. per.                                          | Continuous Monitoring and record           |
|                | TRS                     | 14.0 PPM (MAX. DAILY AVERAGE) Rule 1-1655                                              | Continuous monitoring and record           |

Conditions:

- 1) Submit a quarterly report of testing results with all values exceeding limitations specified in this permit summarized with corrective procedures taken for each occurrence.
- 2) Submit a copy of the ESP routine monitoring and maintenance procedures, including methods to ascertain which electrodes are in place and maintaining an optimum sparking rate for all sections. Summary reports of maintenance shall be submitted semi-annually.

Validation (if different from Facility Permit)

Effective \_\_\_\_\_

Expiration December 31, 1980

  
\_\_\_\_\_  
Authorizing Signature

Potlatch Corporation  
Pulp and Paper Unit

located near Lewiston, Idaho

is hereby granted permission to operate the following air pollution source or control equipment; Their No. 3 Kraft Process Recovery Furnace with Associated Direct Contact Evaporator and Electrostatic Precipitator (ESP)

# Restrictions:

| Emission Point | Emission Characteristic | Emission Limitations                                                    | Monitoring Requirements                    |
|----------------|-------------------------|-------------------------------------------------------------------------|--------------------------------------------|
| ESP            | Particulates            | 0.05 GR DRY Corrected to 8.0% (2.3 LB/ADT) (Max. Dly. Avg.) Rule 1-1902 | Monthly Source Test using Idaho Procedures |
|                | Visible Emissions       | 40% opacity except 3 min. in any 60 minute period                       | Continuous monitoring and recording        |
|                | TRS                     | 14.0 PPM (Max. Dly. Avg.) Rule 1-1655                                   | Continuous monitoring and recording        |

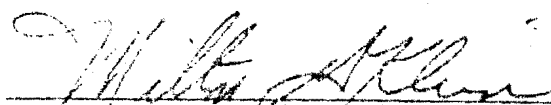
# Conditions:

- 1) Submit a quarterly report of testing results with all values exceeding limits specified in this permit summarized with corrective procedures taken for each occurrence.
- 2) Submit a copy of the ESP routine monitoring and maintenance procedures including methods to ascertain which electrodes are in place and maintaining an optimum sparking rate for all sections. Summary report of maintenance shall be submitted semi-annually.
- 3) Adherence with conditions of Board Order dated September 30, 1980, Docket #0310-79-15, Section III.

Validation (if different from Facility Permit)

Effective December 31, 1980

Expiration December 31, 1985

  
Authorizing Signature

## PART I

SOURCE PERMIT NO. 13-1140-0001-03

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POTLATCH CORPORATION  
PULP AND PAPER UNIT

located at LEWISTON, IDAHO

is hereby granted permission to operate the following air pollution  
source or control equipment: THEIR NO. 4 KRAFT RECOVERY FURNACE  
WITH ASSOCIATED-INDIRECT CONTACT EVAPORATOR AND ELECTROSTATIC  
PRECIPITATOR (ESP)

## Restrictions:

| Emission Point | Emission Characteristic | Emission Limitations                                                                           | Monitoring Requirements                    |
|----------------|-------------------------|------------------------------------------------------------------------------------------------|--------------------------------------------|
| ESP            | PARTICULATES            | 0.040 GR/SDCF CORRECTED TO 8% O <sub>2</sub> (~2.0 LB/ADT) (MAX. DAILY AVERAGE)<br>RULE 1-1902 | MONTHLY SOURCE TEST USING IDAHO PROCEDURES |
|                | VIS. EMISSIONS          | 20% OPACITY EXCEPT FOR 3 MIN. IN ANY 60 MIN. PERIOD                                            | CONTINUOUS MONITORING AND RECORDING        |
|                | TRS                     | 15 PPM, DAILY (MAX DLY. AVG)<br>RULE 1-1902                                                    | CONTINUOUS MONITORING & RECORDING          |

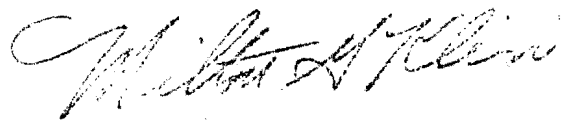
## Conditions:

- 1) SUBMIT A QUARTERLY REPORT OF TESTING RESULTS WITH ALL VALUES EXCEEDING LIMITATIONS SPECIFIED IN THIS PERMIT SUMMARIZED WITH CORRECTIVE PROCEDURES TAKEN FOR EACH OCCURRENCE.
- 2) SUBMIT A COPY OF THE ESP ROUTINE MONITORING AND MAINTENANCE PROCEDURES, INCLUDING METHODS TO ASCERTAIN WHICH ELECTRODES ARE IN PLACE AND MAINTAINING AN OPTIMUM SPARKING RATE FOR ALL SECTIONS. SUMMARY REPORT OF MAINTENANCE SHALL BE SUBMITTED SEMI-ANNUALLY.

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_

  
Authorizing Signature

PART I

SOURCE PERMIT NO. 13-1140-0001-08

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POTLATCH CORPORATION  
PULP AND PAPER UNIT

located at LEWISTON, IDAHO

is hereby granted permission to operate the following air pollution  
source or control equipment: THEIR NO. 1 LIME KILN WITH ASSOCIATED  
VENTURI SCRUBBER AND SETTLING TANKS.

Restrictions:

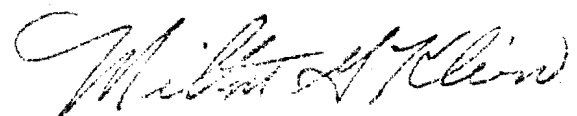
| Emission Point | Emission Characteristic | Emission Limitations                                                                                | Monitoring Requirements                                                                                                                                                             |
|----------------|-------------------------|-----------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| SCRUBBER       | PARTICULATES            | 0.12 GR/SDCF CORRECTED TO 8% O <sub>2</sub><br>(~1.0 LB/TON ADP)<br>(MAX. DLY. AVG.)<br>RULE 1-1658 | MONTHLY SOURCE TEST USING IDAHO PROCEDURES OR EQUIVALENT ALTERNATE (AFTER AN EQUIVALENT OF 30 DAYS OF OPERATION) (VISIBLE EMISSION OBSERVATION AT TIME OF SOURCE TEST IF PERFORMED) |
|                | VIS. EMISSIONS          | 40% OPACITY EXCEPT 3 MIN. IN ANY 60 MINUTE PERIOD<br>RULE 1-1202                                    |                                                                                                                                                                                     |

Conditions:

- 1) SUBMIT QUARTERLY REPORT OF TESTING RESULTS WITH ALL VALUES EXCEEDING LIMITS SPECIFIED IN THIS PERMIT SUMMARIZED WITH CORRECTIVE PROCEDURES TAKEN FOR EACH OCCURRENCE. REPORT SHALL BE SUBMITTED EACH CALENDAR QUARTER FOLLOWING AN EQUIVALENT OF OVER 30 DAYS OF OPERATION.
- 2) SUBMIT A COPY OF OPERATING AND MAINTENANCE PROCEDURES RELATING TO: PRESSURE DROP ACROSS SCRUBBER, WATER RECYCLE RATE, SOLIDS CONTENT OF RECYCLED SCRUBBER WATER AND WATER MAKEUP RATE OR OTHER TO ASSURE OPTIMAL SCRUBBER EFFICIENCY.
- 3) SUBMIT A SEMI-ANNUAL REPORT OF MAINTENANCE ACTIVITIES PURSUANT TO ITEM 2.

Issued \_\_\_\_\_

Expiration \_\_\_\_\_



Authorizing Signature



## PART I

SOURCE PERMIT NO. 13-1140-0001-09

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POTLATCH CORPORATION  
PULP AND PAPER UNIT

located at LEWISTON, IDAHO

is hereby granted permission to operate the following air pollution source or control equipment: THEIR NO. 2 LINE KILN WITH ASSOCIATED SCRUBBER AND SETTLING TANKS.

## Restrictions:

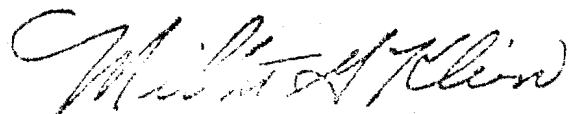
| Emission Point | Emission Characteristic | Emission Limitations                                                                        | Monitoring Requirements                                                                                  |
|----------------|-------------------------|---------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|
| SCRUBBER       | PARTICULATES            | 0.12 GR/DSCF CORRECTED TO 8% O <sub>2</sub> (~1.0 LB/TON ADP) (MAX. DAILY AVG.) RULE 1-1658 | MONTHLY SOURCE TEST IDAHO PROCEDURES OR EQUIVALENT ALTERNATIVE (AFTER AN EQUIVALENT OF DAYS OF OPERATION |
|                | VIS. EMISSIONS          | <40% OPACITY EXCEPT 3 MIN. IN ANY 60 MIN. PER. RULE 1-1202                                  | (VIS. EMISSION OBSERVATION AT TIME SOURCE TEST IS PERFORMED)                                             |

## Conditions:

- 1) SUBMIT A QUARTERLY REPORT OF TESTING RESULTS WITH ALL VALUES EXCEEDING LIMITS SPECIFIED IN THIS PERMIT SUMMARIZED WITH CORRECTIVE PROCEDURES TAKEN FOR EACH OCCURRENCE. REPORT SHALL BE SUBMITTED EACH CALENDAR QUARTER FOLLOWING AN EQUIVALENT OF OVER 30 DAYS OF OPERATION.
- 2) SUBMIT A COPY OF OPERATING AND MAINTENANCE PROCEDURES RELATING TO: PRESSURE DROP ACROSS SCRUBBER, WATER RECYCLE RATE, SOLIDS CONTENT OF RECYCLE SCRUBBER WATER AND WATER MAKEUP RATE OR OTHER PARAMETERS TO ASSURE OPTIMAL SCRUBBER EFFICIENCY.
- 3) SUBMIT A SEMI-ANNUAL REPORT OF MAINTENANCE ACTIVITIES PURSUANT TO ITEM 2. Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_



Authorizing Signature

## PART I

SOURCE PERMIT NO. 13-1140-0001Page 12 of 19POTLATCH CORPORATION  
PULP AND PAPER UNITlocated at LEWISTON, IDAHO

is hereby granted permission to operate the following air pollution  
source or control equipment: THEIR NO. 3 LIME KILN WITH ASSOCIATED  
SCRUBBER AND SETTLING TANKS.

## Restrictions:

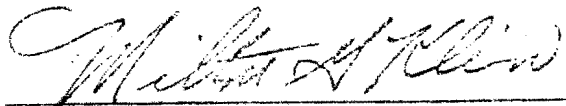
| Emission Point | Emission Characteristic | Emission Limitations                                                                               | Monitoring Requirements                                               |
|----------------|-------------------------|----------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------|
| SCRUBBER       | PARTICULATES            | 0.12 GR/DSCF CORRECTED TO 8% O <sub>2</sub><br>(~1.0 LB/TON ADP)<br>(MAX DLY. AVG.)<br>RULE 1-1658 | MONTHLY SOURCE TESTING USING IDAHO PROCEDURES OR EQUIVALENT ALTERNATE |
|                | VIS. EMISSIONS          | <40% OPACITY EXCEPT 3 MIN. IN ANY 60 MIN. PER.<br>RULE 1-1202                                      |                                                                       |

## Conditions:

- 1) SUBMIT A QUARTERLY REPORT OF TESTING RESULTS WITH ALL VALUES EXCEEDING LIMIT SPECIFIED IN THIS PERMIT SUMMARIZED WITH CORRECTIVE PROCEDURES TAKEN FOR EACH OCCURRENCE. REPORT SHALL BE SUBMITTED EACH CALENDAR QUARTER FOLLOWING AN EQUIVALENT OF OVER 30 DAYS OF OPERATION.
- 2) SUBMIT A COPY OF OPERATING AND MAINTENANCE PROCEDURES RELATING TO: PRESSURE DROP ACROSS SCRUBBER, WATER RECYCLE RATE, SOLIDS CONTENT OF RECYCLE SCRUBBER WATER AND WATER MAKEUP RATE OR OTHER PARAMETERS TO ASSURE OPTIMAL SCRUBBER EFFICIENCY.
- 3) SUBMIT A SEMI-ANNUAL REPORT OF MAINTENANCE ACTIVITIES PURSUANT TO ITEM 2.

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration June 30, 1981  
\_\_\_\_\_  
Authorizing Signature

Potlatch Corporation  
Pulp and Paper Unit

located near Lewiston, Idaho

is hereby granted permission to operate the following air pollution source or control equipment; Their No. 3 Lime Kiln with associated Venturi Scrubber and Settling Tanks

Restrictions:

| Emission Point | Emission Characteristic   | Emission Limitations                                                                       | Monitoring Requirements                                              |
|----------------|---------------------------|--------------------------------------------------------------------------------------------|----------------------------------------------------------------------|
| Scrubber       | Particulates              | 0.090 GR/DSCF Corrected to 10% O <sub>2</sub> (-1.6 Lb/Ton ADP) Max. Dly. Avg.             | Monthly source test using Idaho procedures or equivalent alternative |
|                | (Kiln Heated by Fuel Oil) | 0.110 GR/DSCF Corrected to 10% O <sub>2</sub> (-1.8 Lb/Ton ADP) Max. Dly. Avg. Rule 1-1902 |                                                                      |
|                | Vis. Emissions            | 30% Opacity except 3 min. in any 60 min. period                                            | Visible emission observation at time source test is performed.       |

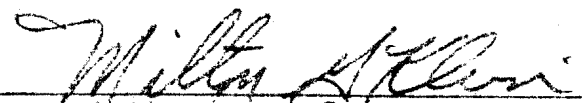
Conditions:

See Appendix A and Appendix B.

Validation (if different from Facility Permit)

Effective July 1, 1980

Expiration \_\_\_\_\_

  
\_\_\_\_\_  
Authorizing Signature

## PART I

SOURCE PERMIT NO. 13-1140-0001Page 14 of 19POTLATCH CORPORATION  
PULP AND PAPER UNITlocated at LEWISTON, IDAHO

is hereby granted permission to operate the following air pollution  
source or control equipment: THEIR NO. 4 LIME KILN ASSOCIATED  
WITH VENTURI SCRUBBER AND SETTLING TANKS.

## Restrictions:

| Emission Point | Emission Characteristic                      | Emission Limitations                                                              | Monitoring Requirements                                        |
|----------------|----------------------------------------------|-----------------------------------------------------------------------------------|----------------------------------------------------------------|
| SCRUBBER       | PARTICULATES<br>(KILN HEATED BY NATURAL GAS) | 0.070 GR/DSCF CORRECTED TO 10% O <sub>2</sub><br>(~.60 LB/TON ADP)<br>RULE 1-1902 | MONTHLY SOURCE TEST USING IDAH<br>PROCEDURES OR E<br>ALTERNATE |
|                | (KILN HEATED BY FUEL OIL)                    | 0.090 GR/DSCF CORRECTED TO 10% O <sub>2</sub><br>(~.74 LB/TON ADP)<br>RULE 1-1902 |                                                                |
|                | VIS. EMISSIONS                               | 20% OPACITY EXCEPT FOR 3 MIN.<br>IN ANY 60 MIN.<br>PERIOD                         | (VIS. EMISSION OBSERVATION AT<br>SOURCE TEST IS PERFORMED)     |

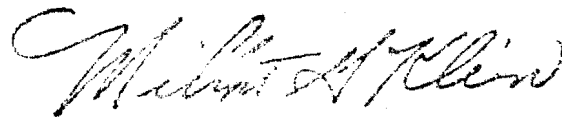
## Conditions:

SEE APPENDIX A

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_



Authorizing Signature

## PART I

SOURCE PERMIT NO. 13-1140-0001-10Page 15 of 19

POTLATCH CORPORATION

located at LEWISTON, IDAHO

is hereby granted permission to operate the following air pollution  
source or control equipment: THEIR NO. 1, 2, and 3 RECOVERY FURNACE  
SMELT DISSOLVING TANKS WITH ASSOCIATED COMMON SCRUBBER AND STACK

## Restrictions:

| Emission Point | Emission Characteristic | Emission Limitations                                              | Monitoring Requirements       |
|----------------|-------------------------|-------------------------------------------------------------------|-------------------------------|
| SCRUBBER       | PARTICULATES            | 0.060 GR/DSCF<br>(~0.4 LB/TADP<br>(MAX. DLY. AVG)<br>RULE 1-1902  | SEMI-ANNUAL SOURCE<br>TESTING |
|                | VIS. EMISSIONS          | <20% OPACITY EX-<br>CEPT FOR 3 MIN.<br>IN ANY 60 MINUTE<br>PERIOD |                               |

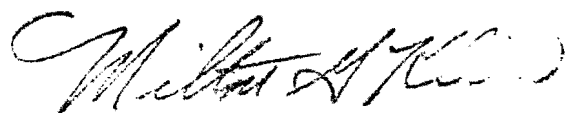
## Conditions:

- 1) SUBMIT A SEMI-ANNUAL REPORT OF TESTING RESULTS INCLUDING ANY VALUES EXCEEDING PERMIT LIMITS AND PROCEDURES USED TO CORRECT EXCEEDENCE.

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_

  
\_\_\_\_\_  
Authorizing Signature

## PART I

SOURCE PERMIT NO. 13-1140-0001Page 16 of 19

POTLATCH CORPORATION

PULP AND PAPER UNIT located at LEWISTON, IDAHO

is hereby granted permission to operate the following air pollution  
source or control equipment: THEIR NO. 4 RECOVERY FURNACE SMELT  
DISSOLVING TANK WITH ASSOCIATED SCRUBBER AND STACK.

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## Restrictions:

Emission  
Point  
SCRUBBEREmission  
Characteristic  
PARTICULATESEmission  
Limitations  
0.070 GR/DSCF  
(~0.4 LB/TADP)  
(MAX. DLY. AVG)  
RULE 1-1902  
  
<20% OPACITY EX-  
CEPT FOR 3 MIN.  
IN ANY 60 MINUTE  
PERIODMonitoring  
Requirements  
SEMI-ANNUAL SOUR  
TESTING

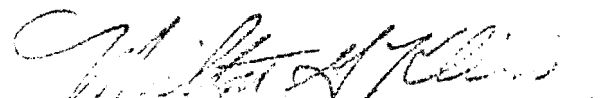
## Conditions:

- 1) SUBMIT A SEMI-ANNUAL REPORT OF TEST RESULTS INCLUDING ANY VALUES EXCEEDING PERMIT LIMITS AND PROCEDURES USED TO CORRECT EXCEEDENCE.

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_

  
\_\_\_\_\_  
Authorizing Signature

## PART II GENERAL PROVISIONS

- A All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant identified in this permit in excess of that authorized, or non-compliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules and Regulations 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 by breakdowns as defined in the Rules and Regulations 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 laws.
- C The permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
- 1) To enter upon the permittee's 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 equipment or monitoring method required in this permit, and to sample any emission of pollutants.

D Except for data determined to be confidential under section 39-111, Idaho Code, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Division of Environment.

E Nothing in this permit shall be construed to preclude institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties established pursuant to any applicable federal, state, or local law or regulation.

F In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Director.



- 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.
- H Until the expiration date, this permit shall be renewable annually, provided the permittee submits any and all information required by the Director to assess the air pollution impact of the equipment for which the permit is granted. Failure to submit such information within sixty (60) days after receipt of the Director's request shall cause the permit to be voided.
- I The Department may require the permittee to develop an Operational and Maintenance Manual which must be approved by the Director. Such Manual shall become a part of this permit by reference, and failure to comply with the terms of the Manual shall constitute a violation of this permit.
- J The permittee shall provide the appropriate regional office a minimum of five (5) days notice prior to conducting any compliance tests required pursuant to this permit. Any records or data generated as a result of such compliance tests shall be made available to the Department upon request.

APPENDIX A

- 1) SUBMIT A QUARTERLY REPORT OF TESTING RESULTS WITH ALL VALUES EXCEEDING LIMITS SPECIFIED IN THIS PERMIT SUMMARIZED WITH CORRECTIVE PROCEDURES TAKEN FOR EACH OCCURRENCE. REPORT SHALL BE SUBMITTED EACH CALENDAR QUARTER FOLLOWING AN EQUIVALENT OF OVER 30 DAYS OF OPERATION.
- 2) SUBMIT A COPY OF OPERATING AND MAINTENANCE PROCEDURES RELATING TO: PRESSURE DROP ACROSS SCRUBBER, WATER RECYCLE RATE, SOLIDS CONTENT OF RECYCLE SCRUBBER WATER AND WATER MAKEUP RATE OR OTHER PARAMETERS TO ASSURE OPTIMAL SCRUBBER EFFICIENCY.
- 3) SUBMIT A SEMI-ANNUAL REPORT OF MAINTENANCE ACTIVITIES PURSUANT TO ITEM 2.

# APPENDIX B

Potlatch Corporation  
Pulp and Paper Unit

SOURCE PERMIT NO. 13-1140-00

- 1) The permittee maintains a differential pressure across the Venturi Scrubber of at least 18 inches of water, and a maximum solids level in the scrubbing solution of 7%.
- 2) The permittee install a "Flooded elbow" just prior to the scrubbing tank on #3 Lime Kiln, said Flooded elbow to be completed and operating by January 15, 1980.
- 3) The permittee shall comply with the following emission limits if, by July 1, 1981, it can be shown that they can be consistently met:

## EMISSION CHARACTERISTIC

## EMISSION LIMITATION

Particulates (Kiln Heated by Natural Gas)

0.02 GR/DSCF Corrected to 10% O<sub>2</sub>.

Particulates (Kiln Heated by Fuel Oil)

0.10 GR/DSCF Corrected to 10% O<sub>2</sub>.

Vis. Emissions

25% opacity except 3 min. in any 60 min. period



(Lewiston)

Appendix H.2

FACILITY PERMIT NO. 13-1140-0003-

Page 1 of \_\_\_\_

STATE OF IDAHO  
DEPARTMENT OF HEALTH AND WELFARE  
DIVISION OF ENVIRONMENT

Pursuant to the Provisions  
of Section 39-115 of the Idaho Code,  
and the Rules and Regulations for the Con-  
trol of Air Pollution in Idaho,

POTLATCH CORPORATION - CLEARWATER UNIT  
Permittee, including affiliates, if any

P.O. BOX 1016  
Located at

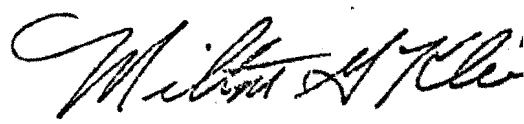
LEWISTON, IDAHO 83501

is hereby granted permission to operate the Air  
Pollution Source(s) and Control Equipment specified  
herein provided the emission limitations, monitoring  
requirements and other conditions set forth in the  
Source Permit(s) are complied with.

Validation:

Issued July 5, 1979

Expiration January 31, 1984

  
\_\_\_\_\_  
Director

## PART I

SOURCE PERMIT NO. 13-1140-0003-01Page 2 of 9POTLATCH CORPORATION  
CLEARWATER UNITlocated at LEWISTON, IDAHO

is hereby granted permission to operate the following air pollution  
source or control equipment: THE SPREADER STOKER WOOD WASTE FIRED  
"RILEY" BOILER AND ASSOCIATED WET SCRUBBER

## Restrictions:

| Emission<br>Point | Emission<br>Characteristic | Emission<br>Limitations                                                                                    | Monitoring<br>Requirements                                      |
|-------------------|----------------------------|------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------|
| SCRUBBER          | PARTICULATES               | 0.130 GRAINS/DRY<br>STANDARD CUBIC FT.<br>CORRECTED TO 8% O <sub>2</sub><br>(~0.25 LB/10 <sup>6</sup> BTU) | MONTHLY SOURCE<br>TESTS                                         |
|                   | VISIBLE EMISSIONS          | <40% OPACITY NOT<br>TO BE EXCEEDED MORE<br>THAN 3 MINUTES IN<br>ANY 60 MINUTE PER.<br>RULE 1-1202          | (VISIBLE EMIS<br>OBSERVATIONS<br>THE TIME OF TI<br>SOURCE TEST) |

## Conditions:

- 1) SUBMIT QUARTERLY REPORT OF TESTING RESULTS CONTAINING A LISTING OF ALL VALUES WHICH EXCEED THE LIMITS SET FORTH IN THIS PERMIT AND THE PROCEDURES TAKEN TO REDUCE VALUES BELOW THOSE LIMITS.
- 2) SUBMIT A COPY OF OPERATING AND MAINTENANCE PROCEDURES RELATING TO: PRESSURE DROP ACROSS SCRUBBER, WATER RECYCLE RATE, SOLIDS CONTENT OF RECYCLE SCRUBBER WATER AND WATER MAKEUP RATE OR OTHER PARAMETERS TO ASSURE OPTIMAL SCRUBBER EFFICIENCY.

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration JANUARY 31, 1981

PART I

SOURCE PERMIT NO. 13-1140-0003-01

Page 3 of 9

POTLATCH CORPORATION  
CLEARWATER UNIT

located at LEWISTON, IDAHO

is hereby granted permission to operate the following air pollution  
source or control equipment: THE SPREADER STOKER WOOD WASTE FIRED  
"RILEY" BOILER AND ASSOCIATED WATER SCRUBBER.

Restrictions:

| Emission<br>Point | Emission<br>Characteristic | Emission<br>Limitations                                                                                                        | Monitoring<br>Requirements                                     |
|-------------------|----------------------------|--------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------|
| SCRUBBER          | PARTICULATES               | 0.080 GRAINS/DRY<br>STANDARD CUBIC<br>FOOT, CORRECTED<br>TO 8% O <sub>2</sub> (~0.16<br>LB/10 <sup>6</sup> BTU) RULE<br>1-1902 | MONTHLY SOURCE<br>TESTS                                        |
|                   | VISIBLE EMISSIONS          | <20% OPACITY NOT<br>TO BE EXCEEDED<br>MORE THAN 3 MIN-<br>UTES IN ANY 60<br>MINUTE PERIOD.                                     | (VISIBLE EMISS.<br>OBSERVATIONS AT<br>TIME OF THE SOI<br>TEST) |

Conditions:

- 1) SUBMIT QUARTERLY REPORT OF TESTING RESULTS CONTAINING A LISTING OF ALL VALUES WHICH EXCEED THE LIMITS SET FORTH IN THIS PERMIT AND THE PROCEDURE TAKEN TO REDUCE VALUES BELOW THOSE LIMITS.
- 2) SUBMIT A COPY OF OPERATING AND MAINTENANCE PROCEDURES RELATING TO: PRESSURE DROP ACROSS SCRUBBER, WATER RECYCLE RATE, SOLIDS CONTENT OF RECYCLE SCRUBBER WATER AND WATER MAKEUP RATE OR OTHER PARAMETERS TO ASSURE OPTIMAL SCRUBBER EFFICIENCY.

Validation (if different from Facility Permit)

Effective Date February 1, 1981

Expiration \_\_\_\_\_

*Handwritten signature*

PART I

SOURCE PERMIT NO. 13-1140-0003-06

Page 4 of

POTLATCH CORPORATION  
CLEARWATER UNIT

located at LEWISTON, IDAHO

is hereby granted permission to operate the following air pollution source or control equipment: THEIR DUTCH OVEN TYPE "KIDWELL" HOGGE FUEL BOILERS NO.S 1 AND 2 AND ASSOCIATED BREECHING AND STACK.

Restrictions:

| Emission Point | Emission Characteristic | Emission Limitations                                                                    | Monitoring Requirements       |
|----------------|-------------------------|-----------------------------------------------------------------------------------------|-------------------------------|
| EAST STACK     | PARTICULATES            | 0.18 GR/DSCF TO 8% O <sub>2</sub> (~.36 LB/10 <sup>6</sup> BTU EACH BOILER) RULE 1-1302 | SEMI-ANNUAL SO TESTING        |
|                | VIS. EMISSIONS          | <20% OPACITY EXCEPT FOR 3 MIN. IN ANY 60 MIN. PER. RULE 1-1202                          | CONTINUOUS MONITORING AND REC |

Conditions:

- 1) SUBMIT A QUARTERLY REPORT OF TESTING RESULTS CONTAINING A LISTING OF VALU EXCEEDING LIMITS SPECIFIED IN THIS PERMIT WITH CORRECTIVE MEASURE TAKEN T REDUCE LEVELS OF EMISSIONS.
- 2) UPON CERTIFICATION AND OPERATION OF NO. 4 POWER BOILER, NO MORE THAN TWO WELL BOILERS SHALL BE OPERATED ON WOOD FUEL AT ANY ONE TIME. IF OPERATED, OTHER TWO UNITS SHALL BE FIRED WITH NATURAL GAS. POTLATCH SHALL SUPPLY QUARTERLY DATA INDICATING THE AMOUNT AND TYPES OF FUEL BY EACH KIDWELL BOILER

Validation (if different from Facility Permit)

Issued

Expiration

*M. H. St. Klein*



## PART I

SOURCE PERMIT NO. 13-1140-0003Page 5 of     POTLATCH CORPORATION  
CLEARWATER UNITlocated at LEWISTON, IDAHO

is hereby granted permission to operate the following air pollution  
source or control equipment: THEIR DUTCH OVEN TYPE "KIDWELL" HOGGE  
FUEL FIRED BOILERS NOS. 3 AND 4 AND ASSOCIATED BREECHING AND STACK

## Restrictions:

| Emission Point | Emission Characteristic | Emission Limitations                                                                                    | Monitoring Requirements             |
|----------------|-------------------------|---------------------------------------------------------------------------------------------------------|-------------------------------------|
| WEST STACK     | PARTICULATES            | 0.18 GR/DSCF CORRECTED TO 8% O <sub>2</sub><br>(~.36 LB/10 <sup>6</sup> BTU EACH BOILER)<br>RULE 1-1302 | SEMI-ANNUAL STACK TESTING           |
|                | VIS. EMISSIONS          | <20% OPACITY EXCEPT FOR 3 MIN. IN ANY 60 MIN. PERIOD - RULE 1-1202                                      | CONTINUOUS MONITORING AND RECORDING |

## Conditions:

- 1) SUBMIT A QUARTERLY REPORT OF TESTING RESULTS CONTAINING A LISTING OF VALUES EXCEEDING THE LIMITS SPECIFIED IN THIS PERMIT WITH CORRECTIVE MEASURES TAKEN TO REDUCE LEVELS OF EMISSIONS.
- 2) UPON CERTIFICATION AND OPERATION OF NO. 4 POWER BOILER, NO MORE THAN TWO KIDWELL BOILERS SHALL BE OPERATED ON WOOD FUEL AT ANY ONE TIME. IF OPERATING THE OTHER TWO UNITS SHALL BE FIRED WITH NATURAL GAS. POTLATCH SHALL SUPPLY QUARTERLY DATA INDICATING THE AMOUNT AND TYPES OF FUEL USED BY EACH KIDWELL BOILER.

Validation (if different from Facility Permit)

Issued                     Expiration                     


Authorizing Signature

PART I

SOURCE PERMIT NO. 13-1140-0003

Page 6a of 9

POTLATCH CORPORATION  
CLEARWATER UNIT

located at LEWISTON, IDAHO

is hereby granted permission to operate the following air pollution  
source or control equipment: A PLYSTRAN UNIT WITH ASSOCIATED DRYER

Restrictions:

| Emission<br>Point | Emission<br>Characteristic | Emission<br>Limitations                                                          | Monitoring<br>Requirements                   |
|-------------------|----------------------------|----------------------------------------------------------------------------------|----------------------------------------------|
| DRYER             | VISIBLE EMISSIONS          | <40% OPACITY EX-<br>CEPT FOR 3 MIN.<br>IN ANY 60 MIN.<br>PERIOD (RULE<br>1-1203) | CONTINUOUS MOI-<br>TORING AND RE-<br>CORDING |

Conditions:

- 1) SUBMIT A QUARTERLY REPORT OF TESTING RESULTS INCLUDING ALL VALUES WHICH EXCEED THE LIMITS SET FORTH IN THIS PERMIT AND THE PROCEDURES TAKEN TO REDUCE ANY EXCEEDANCE BELOW THOSE LIMITS.
- 2) SUBMIT OPERATING AND MAINTENANCE PROCEDURES ON THE DRYER WHICH ARE DESIGNED TO ENSURE UNIT OPERATES IN A MANNER TO MINIMIZE SMOKE PRODUCTION INCLUDING CONSIDERATION OF OPTIMAL COMBUSTION CHAMBER TEMPERATURE.

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_



Authorizing Signature

PART I

SOURCE PERMIT NO. 13-1140-0003

Page 6b of 9

POTLATCH CORPORATION  
CLEARWATER UNIT

located at LEWISTON, IDAHO

is hereby granted permission to operate the following air pollution  
source or control equipment: A PLYSTRAN UNIT WITH ASSOCIATED DRYE

Restrictions:

| Emission<br>Point | Emission<br>Characteristic | Emission<br>Limitations                                                           | Monitoring<br>Requirements                    |
|-------------------|----------------------------|-----------------------------------------------------------------------------------|-----------------------------------------------|
| DRYER             | VISIBLE EMISSIONS          | <40% OPACITY<br>EXCEPT FOR 3<br>MINUTES IN ANY<br>60 MINUTE PERIOD<br>RULE 1-1203 | CONTINUOUS MON-<br>ITORING AND RE-<br>CORDING |

Conditions:

- 3) REDUCE VISIBLE EMISSIONS TO LESS THAN 20% OPACITY, EXCEPT FOR 3 MINUTES  
IN ANY 60 MINUTE PERIOD IN ACCORDANCE WITH THE FOLLOWING SCHEDULE:
- a) BY JULY 1, 1976, COMPLETE ENGINEERING STUDY
  - b) BY JULY 15, 1979, ORDER ALL NECESSARY CONTROLS OR MODIFICATIONS
  - c) BY JUNE 1, 1980, COMPLETE INSTALLATION OF NECESSARY CONTROLS AND MOD-  
IFICATIONS
  - d) BY JULY 1, 1980, ASSURE FINAL COMPLIANCE WITH THIS CONDITION

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_

*Milton L. Klein*

## PART II GENERAL PROVISIONS

- A All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant identified in this permit in excess of that authorized, or non-compliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules and Regulations 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 by breakdowns as defined in the Rules and Regulations 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 laws.
- C The permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
- 1) To enter upon the permittee's 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 equipment or monitoring method require in this permit, and to sample any emission of pollutants.

D Except for data determined to be confidential under section 39-111, Idaho Code, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Division of Environment.

E Nothing in this permit shall be construed to preclude institution of any legal action or relieve the permitt from any responsibilities, liabilities, or penalties established pursuant to any applicable federal, state, or local law or regulation.

F In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Director.

- 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.
- H Until the expiration date, this permit shall be renewable annually, provided the permittee submits any and all information required by the Director to assess the air pollution impact of the equipment for which the permit is granted. Failure to submit such information within sixty (60) days after receipt of the Director's request shall cause the permit to be voided.
- I The Department may require the permittee to develop an Operational and Maintenance Manual which must be approved by the Director. Such Manual shall become a part of this permit by reference, and failure to comply with the terms of the Manual shall constitute a violation of this permit.
- J The permittee shall provide the appropriate regional office a minimum of five (5) days notice prior to conducting any compliance tests required pursuant to this permit. Any records or data generated as a result of such compliance tests shall be made available to the Department upon request.

STATE OF IDAHO  
DEPARTMENT OF HEALTH AND WELFARE  
DIVISION OF ENVIRONMENT

Pursuant to the Provisions  
of Section 39-115 of the Idaho Code,  
and the Rules and Regulations for the Con-  
trol of Air Pollution in Idaho,

Coast Trading Company, Inc.  
Permittee, including affiliates, if any

Lewiston,  
Located at

Idaho 83501

is hereby granted permission to operate the Air  
Pollution Source(s) and Control Equipment specified  
herein provided the emission limitations, monitoring  
requirements and other conditions set forth in the  
Source Permit(s) are complied with.

Validation:

Issued 6/29/79

Expiration 6/28/84

Milton G. Klein  
Director 844

## PART I

SOURCE PERMIT NO. 13-1140-0011-01Page 2 of 8

Coast Trading Company, Inc. located at Lewiston, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment: Their grain terminal truck dump and  
• barge loading unit with associated fabric filter.

## Restrictions:

| Emission Point | Emission Characteristic   | Emission Limitations                                                                          | Monitoring Requirements                                                                |
|----------------|---------------------------|-----------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------|
| Fabric Filter  | Particulate               | < 10% opacity not to be exceeded more than 3 minutes in any 60 minute period, Rule 1-1203     | Weight of dust collected by fabric filter reported quarterly, Manual Sec. 1-1005.01(c) |
| Truck Dump     | Particulate Fugitive Dust | < 20% opacity not to be exceeded more than 3 minutes in any 60 minute period, Rule 1-1203     | None                                                                                   |
| Barge Loading  | Particulate Fugitive Dust | < 20% opacity not to be exceeded for more than 3 minutes in any 60 minute period, Rule 1-1203 | None                                                                                   |

## Conditions:

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_

*Milton J. Klein*  
\_\_\_\_\_  
Authorizing Signature



## PART I

SOURCE PERMIT NO. 13-1140-0011-02Page 3 of 8Coast Trading Company, Inc. located at Lewiston, Idaho

is hereby granted permission to operate the following air pollution  
source or control equipment: Their plant access roads.

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## Restrictions:

| Emission<br>Point | Emission<br>Characteristic | Emission<br>Limitations                                                                                                                                                                                                                                                 | Monitoring<br>Requirements                                    |
|-------------------|----------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------|
| Roads             | Fugitive Dust              | Compliance with Manual<br>Section 1-1251 of <u>Rules<br/>&amp; Regulations for Control<br/>of Air Pollution in Idaho</u><br>Include all reasonable<br>precautions to prevent<br>particulate matter from<br>becoming airborne as<br>described in attached<br>Appendix A. | Quarterly rep<br>of measures<br>which have be<br>implemented. |

## Conditions:

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration 12/31/80

Mildred J. Klein  
Authorizing Signature

## PART I

SOURCE PERMIT NO. 13-1140-0011-02Page 4 of 8

Coast Trading Company, Inc. located at Lewiston, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment: Their plant access roads.

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## Restrictions:

| Emission Point                       | Emission Characteristic   | Emission Limitations                                                                                                             | Monitoring Requirements |
|--------------------------------------|---------------------------|----------------------------------------------------------------------------------------------------------------------------------|-------------------------|
| Incoming Traffic Access Road         | Particulate Fugitive Dust | The incoming traffic access road shall be paved. Paving shall be maintained in a clean condition as per Manual Section 1-1252.06 | None                    |
| Exit Traffic Access Road Conditions: | Particulate Fugitive Dust | The exit traffic access road shall be paved. Paving shall be maintained in a clean condition as per Manual Section 1-1252.06     | None                    |

Validation (if different from Facility Permit)

Effective 1/1/81

Expiration \_\_\_\_\_

*Milton G. Klein*  
\_\_\_\_\_  
Authorizing Signature

## PART II GENERAL PROVISIONS

- A All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant identified in this permit in excess of that authorized, or non-compliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules and Regulations 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 by breakdowns as defined in the Rules and Regulations 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 laws.
- C The permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
- 1) To enter upon the permittee's 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 equipment or monitoring method required in this permit, and to sample any emission of pollutants.

D Except for data determined to be confidential under section 39-111, Idaho Code, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Division of Environment.

E Nothing in this permit shall be construed to preclude institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties established pursuant to any applicable federal, state, or local law or regulation.

F In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Director.

- 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.
- H Until the expiration date, this permit shall be renewable annually, provided the permittee submits any and all information required by the Director to assess the air pollution impact of the equipment for which the permit is granted. Failure to submit such information within sixty (60) days after receipt of the Director's request shall cause the permit to be voided.
- I The Department may require the permittee to develop an Operational and Maintenance Manual which must be approved by the Director. Such Manual shall become a part of this permit by reference, and failure to comply with the terms of the Manual shall constitute a violation of this permit.
- J The permittee shall provide the appropriate regional office a minimum of five (5) days notice prior to conducting any compliance tests required pursuant to this permit. Any records or data generated as a result of such compliance tests shall be made available to the Department upon request.

APPENDIX A

- 1) All haul roads, access roads and traffic patterns shall be paved, oiled, or watered at least twice daily during the operating season unless wet because of natural precipitation, in order to control fugitive dust.
- 2) All paved areas on the plant grounds shall be maintained in a dust-free condition by wet sweeping or equivalent methods. The removal of dust shall be accomplished at least weekly during the operating season and more frequently if required because of excessive dust accumulation and dry weather.
- 3) All permittee-owned or operated open-bodied trucks transporting fugitive dust generating materials to or from the plant location shall be covered at all times while in motion on public roads.

STATE OF IDAHO  
DEPARTMENT OF HEALTH AND WELFARE  
DIVISION OF ENVIRONMENT

Pursuant to the Provisions  
of Section 39-115 of the Idaho Code,  
and the Rules and Regulations for the Con-  
trol of Air Pollution in Idaho,

Lewis-Clark Terminal Association  
Permittee, including affiliates, if any  
Lewiston,  
Located at  
Idaho

is hereby granted permission to operate the Air  
Pollution Source(s) and Control Equipment specified  
herein provided the emission limitations, monitoring  
requirements and other conditions set forth in the  
Source Permit(s) are complied with.

## Validation:

Issued 6/29/79Expiration 6/28/84

*Milton S. Klein*  
Director

## PART I

SOURCE PERMIT NO. 13-1140-0010-01

Page 2 of 7

Lewis-Clark Terminal Association located at Lewiston, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment: Their grain terminal truck dump and  
barge loading unit with associated fabric filter.

## Restrictions:

| Emission<br>Point | Emission<br>Characteristic   | Emission<br>Limitations                                                                                | Monitoring<br>Requirements                                                                        |
|-------------------|------------------------------|--------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------|
| Fabric Filter     | Particulate                  | <10% opacity not to<br>be exceeded more than<br>3 minutes in any 60<br>minute period - Rule<br>1-1203  | Weight of dust<br>collected by fa<br>filter reported<br>quarterly manua<br>Section 1-1005.<br>(c) |
| Truck Dump        | Particulate                  | < 20% opacity not to be<br>exceeded more than 3<br>minutes in any 60<br>minute period - Rule<br>1-1203 | None                                                                                              |
| Barge Loading     | Particulate<br>Fugitive Dust | < 20% opacity not to be<br>exceeded more than 3<br>minutes in any 60<br>minute period - Rule<br>1-1203 | None                                                                                              |

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_

*Milton S. Klein*  
\_\_\_\_\_  
Authorizing Signature



PART I

SOURCE PERMIT NO. 13-1140-0010-02

Page 3 of 7

Lewis-Clark Terminal Association located at Lewiston, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment: Their plant access roads.

Restrictions:

| Emission Point | Emission Characteristic | Emission Limitations                                                                                                                                                                                                                                 | Monitoring Requirements                                 |
|----------------|-------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------|
| Roads          | Fugitive Dust           | Compliance with Manual Section 1-1251 of Rules & Regulations For The Control of Air Pollution in Idaho Manual Include all reasonable precautions to prevent particulate matter from becoming airborne as described in attached listings 1 through 3. | Quarterly rep. of measures which have been implemented. |

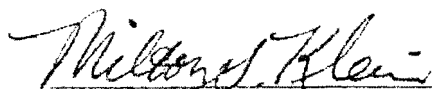
Conditions:

Compliance with requirements listed in Appendix A.

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration August 31, 1980

  
Authorizing Signature

## PART I

SOURCE PERMIT NO. 13-1140-0010-02Page 4 of 7

Lewis-Clark Terminal Association located at Lewiston, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment: Their plant access roads.

## Restrictions:

| Emission<br>Point               | Emission<br>Characteristic | Emission<br>Limitations                                                                                                                      | Monitoring<br>Requirements |
|---------------------------------|----------------------------|----------------------------------------------------------------------------------------------------------------------------------------------|----------------------------|
| Incoming Traffic<br>Access Road | Particulate                | The incoming traffic access<br>road shall be paved. Paving<br>shall be maintained in a clean<br>condition as per manual Section<br>1-1252.06 | None                       |
| Exit traffic<br>Access Road*    | Particulate                | Compliance with Manual Section<br>1-1252                                                                                                     |                            |

## Conditions:

If the eastern boundary of the property line is changed before the expiration of this permit the exit traffic access road shall be paved within nine (9) months of said occurrence.

Compliance with requirements listed in Appendix A.

Validation (if different from Facility Permit)

Effective 9/1/80

Expiration \_\_\_\_\_

Nelson J. Klein  
Authorizing Signature

- 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 equipment or monitoring method required in this permit, and to sample any emission of pollutants.
- D Except for data determined to be confidential under section 39-111, Idaho Code, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Division of Environment.
- E Nothing in this permit shall be construed to preclude institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties established pursuant to any applicable federal, state, or local law or regulation.
- F In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Director.

## PART II      GENERAL PROVISIONS

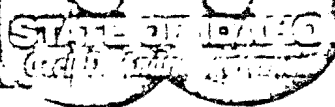
- A      All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant identified in this permit in excess of that authorized, or non-compliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules and Regulations 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 by breakdowns as defined in the Rules and Regulations 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 laws.
- C      The permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
- 1)      To enter upon the permittee's 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

- 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.
- H Until the expiration date, this permit shall be renewable annually, provided the permittee submits any and all information required by the Director to assess the air pollution impact of the equipment for which the permit is granted. Failure to submit such information within sixty (60) days after receipt of the Director's request shall cause the permit to be voided.
- I The Department may require the permittee to develop an Operational and Maintenance Manual which must be approved by the Director. Such Manual shall become a part of this permit by reference, and failure to comply with the terms of the Manual shall constitute a violation of this permit.
- J The permittee shall provide the appropriate regional office a minimum of five (5) days notice prior to conducting any compliance tests required pursuant to this permit. Any records or data generated as a result of such compliance tests shall be made available to the Department upon request.

## APPENDIX A

- 1) All haul roads, access roads and traffic patterns shall be paved, oiled, or watered at least twice daily during the operating season unless wet because of natural precipitation, in order to control fugitive dust.
- 2) All paved areas on the plant grounds shall be maintained in a dust-free condition by wet sweeping or equivalent methods. The removal of dust shall be accomplished at least weekly during the operating season and more frequently if required because of excessive dust accumulation and dry weather.
- 3) All permittee-owned or operated open-bodied trucks transporting fugitive dust generating materials to or from the plant location shall be covered at all times while in motion on public roads.

department of health and welfare



STATEHOUSE, BOISE, 83720

Page 1

Permit No. 0880-0008

POLLUTION SOURCE PERMIT

In compliance with the provisions of Section 39-115, Idaho Code,

POE ASPHALT

is authorized to emit from a facility located at \_\_\_\_\_

Lewiston, Idaho

in accordance with emission limitations, monitoring requirements  
and other conditions set forth in Parts I, II, and III hereof.

This permit shall become effective on March 1, 1976.

This permit and the authorization to discharge shall expire at  
midnight, March 1, 1981.

Signed this \_\_\_\_\_ day of \_\_\_\_\_

A handwritten signature in cursive script, appearing to read "Milton S. Klein".

DIRECTOR

## PART I

## A. EMISSION LIMITATIONS AND MONITORING REQUIREMENTS

1. During the period beginning March 1, 1976 and lasting through March 1, 1981 the permittee is authorized to discharge to the atmosphere within the limits and monitored by the permittee as specified below:

| <u>EMISSION CHARACTERISTIC</u> |                             | <u>EMISSION LIMITATIONS</u>                                                                                                       | <u>MONITORING REQUIREMENTS</u> |                            |                                |
|--------------------------------|-----------------------------|-----------------------------------------------------------------------------------------------------------------------------------|--------------------------------|----------------------------|--------------------------------|
| <u>Source</u>                  | <u>Contaminant</u>          |                                                                                                                                   | <u>Measurement Frequency</u>   | <u>Reporting Frequency</u> | <u>Sample Type</u>             |
| Baghouse Stack                 | Total Suspended Particulate | 1. Listed on pg. 32, Table VII-2, Regulation H (copy enclosed pg. 10)<br><br>2. Regulations N and E, Idaho Rules and Regulations. |                                |                            | No routine monitoring required |

2. Samples taken in compliance with the monitoring requirements specified above shall be taken at or near maximum the operating rate of the process unless continuous samples are required.



## PART I

## B. MONITORING AND REPORTING

1. Representative Sampling

Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored emission.

2. Reporting

Monitoring and sampling results shall be summarized, reported, and postmarked no later than the 28th day of the month following the completed reporting period. The first report is due on \_\_\_\_\_.

Reports shall be submitted to the Department of Health and Welfare at the following address:

Department of Health & Welfare  
Air Pollution Control  
Statehouse  
Boise, Idaho 83720

3. Test Procedures

None

4. Recording of Results

For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall record the following information:

- a. The exact source, date, and operating rate at time of sampling;
- b. The analytical techniques or methods used; and
- c. The results of all required analyses.

5. Additional Monitoring by Permittee

If the permittee monitors any pollutant at the location(s) designated herein more frequently than required by this permit, using approved analytical methods as specified above, the results of such monitoring shall be included in the calculation and reporting of the values required. Such increased frequency shall also be indicated.

6. Records Retention

All records and information resulting from the monitoring activities required by this permit including all records of analyses performed and calibration and maintenance of instrumentation and recordings from continuous monitoring instrumentation shall be retained for a minimum of two (2) years, or longer if requested by the Director.

C. SCHEDULE OF COMPLIANCE

1. The permittee shall achieve compliance with the emission limitations specified for discharges in accordance with the following schedule:

None

2. No later than 15 calendar days following a date identified in the above schedule of compliance, the permittee shall submit either a report of progress or, in the case of specific actions being required by identified dates, a written notice of compliance or noncompliance. In the latter case, the notice shall include the cause of noncompliance, any remedial actions taken, and the probability of meeting the next scheduled requirement.

## PART II

## A. MANAGEMENT REQUIREMENTS

1. Change in Discharge

All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant identified in this permit more frequently than or at a level in excess of that authorized shall constitute a violation of the permit. Any anticipated facility expansions, production increases, or process modifications which will result in new, different, or increased emission of pollutants must be reported by submission of a new application or, if such changes will not violate the emission limitations specified in this permit, by notice to the permit issuing authority of such changes. Following such notice, the permit may be modified to specify and limit any pollutants not previously limited.

2. Noncompliance Notification

If, for any reason, the permittee does not comply with or will be unable to comply with any emission limitation specified in this permit, the permittee shall provide the Administrator with the following information, in writing, within five (5) days of becoming aware of such condition:

- a. A description of the emission and cause of noncompliance; and
- b. The period of noncompliance, including exact dates and times; or if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate and prevent recurrence of the noncomplying emission.

3. Facilities Operation

The permittee shall at all times maintain in good working order and operate as efficiently as possible all treatment or control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this permit.

## PART II

### 4. Adverse Impact

The permittee shall take all reasonable steps to minimize any adverse impact to air quality resulting from noncompliance with any emission limitations specified in this permit, including such accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying emission.

### 5. Bypassing

Any diversion from or bypass of facilities necessary to maintain compliance with the terms and conditions of this permit is prohibited, except where unavoidable to prevent loss of life or severe property damage. The permittee shall promptly notify the Administrator in writing of each such diversion or bypass.

### 6. Removed Substances

Solids, sludges, or other pollutants removed from or resulting from treatment or control of emissions shall be disposed of in compliance with all applicable rules and regulations governing air pollution control, water quality management, and solid waste management.

### 7. Control Equipment Failures

In order to maintain compliance with the emission limitations and prohibitions of this permit, the permittee shall either:

- a. In accordance with the Schedule of Compliance contained in Part I, provide an alternative control system sufficient to control the facilities;

or, if no date for implementation for an alternate control system appears in Part I,

- b. Halt, reduce or otherwise control production and/or emissions upon the reduction, loss, or failure of one or more of the primary control systems in order to maintain ambient air pollution levels below the standards and/or at such a level as to not be harmful to man, animals, or vegetation.

## PART II

### B. RESPONSIBILITIES

#### 1. Right of Entry

The permittee shall allow the Director, and/or his authorized representatives, upon the presentation of credentials:

- a. To enter upon the permittee's 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; and
- b. 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 equipment or monitoring method required in this permit; and to sample any emission of pollutants.

#### 2. Transfer of Ownership or Control

In the event of any change in control or ownership of facilities from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Director.

#### 3. Availability of Reports

Except for data determined to be confidential under Section 39-111, Idaho Code, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of Environmental Services. Emission data shall not be considered confidential. Knowingly making false statement on any such report may result in the imposition of criminal penalties.

#### 4. Permit Modification

After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to, the following:

- a. Violation of any terms or conditions of this permit;
- b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or
- c. A change in any condition that requires either a temporary or permanent reduction or elimination of the authorized emission.

## PART II

### 5. Toxic Pollutants

Notwithstanding Part II, B-4, above, if a toxic emission or ambient standard or prohibition (including any schedule of compliance specified in such emission or ambient standard or prohibition) is established for a toxic pollutant which is present in the emission and such standard or prohibition is more stringent than any limitation for such pollutant in this permit, this permit shall be revised or modified in accordance with the toxic emission or ambient standard or prohibition and the permittee so notified.

### 6. Civil and Criminal Liability

Except as provided in permit conditions on "Bypassing" (Part II, A-5) and "Control Equipment Failures" (Part II, A-7), nothing in this permit shall be construed to relieve the permittee from civil or criminal penalties for noncompliance, with the provisions of this permit.

### 7. Liability

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties to which the permittee is or may be subject.

### 8. Other Laws

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties established pursuant to any applicable Federal, State, or local law or regulation.

### 9. Property Rights

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations.

### 10. Severability

The provisions of this permit are severable, and if any provision of this permit, or the application of 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.

PART III

OTHER REQUIREMENTS

1. Plant fugitive dust emissions shall be kept at a minimum by keeping all duct work and process equipment in a state of good repair.
2. Yard area fugitive dust emissions shall be controlled by:
  - a. Paving, watering or oiling all traffic patterns, with the paved area maintained free of entrainable dust or dirt.
3. Any maintenance pertaining to the baghouse or other emission sources shall be recorded.
4. Dust control equipment shall be operated and maintained within the same operational parameters that existed at the time the plant was tested and found in compliance.
5. Copy of this permit shall be posted in the control room of the plant.

TABLE VII-2

## ALLOWABLE RATE OF EMISSION BASED ON

## PROCESS WEIGHT RATE\*

| Process Weight Rate |         |       | Process Weight Rate |          |       |
|---------------------|---------|-------|---------------------|----------|-------|
| Rate of Emission    |         |       | Rate of Emission    |          |       |
| Lb/Hr               | Tons/Hr | Lb/Hr | Lb/Hr               | Tons/Hr  | Lb/Hr |
| 100                 | 0.05    | 0.551 | 16,000              | 8.00     | 16.5  |
| 200                 | 0.10    | 0.877 | 18,000              | 9.00     | 17.9  |
| 400                 | 0.20    | 1.40  | 20,000              | 10.00    | 19.2  |
| 600                 | 0.30    | 1.83  | 30,000              | 15.00    | 25.2  |
| 800                 | 0.40    | 2.22  | 40,000              | 20.00    | 30.5  |
| 1,000               | 0.50    | 2.58  | 50,000              | 25.00    | 35.4  |
| 1,500               | 0.75    | 3.38  | 60,000              | 30.00    | 40.0  |
| 2,000               | 1.00    | 4.10  | 70,000              | 35.00    | 41.3  |
| 2,500               | 1.25    | 4.76  | 80,000              | 40.00    | 42.5  |
| 3,000               | 1.50    | 5.38  | 90,000              | 45.00    | 43.6  |
| 3,500               | 1.75    | 5.96  | 100,000             | 50.00    | 44.6  |
| 4,000               | 2.00    | 6.52  | 120,000             | 60.00    | 46.3  |
| 5,000               | 2.50    | 7.58  | 140,000             | 70.00    | 47.8  |
| 6,000               | 3.00    | 8.56  | 160,000             | 80.00    | 49.0  |
| 7,000               | 3.50    | 9.49  | 200,000             | 100.00   | 51.2  |
| 8,000               | 4.00    | 10.4  | 1,000,000           | 500.00   | 69.0  |
| 9,000               | 4.50    | 11.2  | 2,000,000           | 1,000.00 | 77.6  |
| 10,000              | 5.00    | 12.0  | 6,000,000           | 3,000.00 | 92.7  |
| 12,000              | 6.00    | 13.6  |                     |          |       |

\*Interpolation of the data in this table for process weight rates up to 60,000 lb/hr shall be accomplished by use of the equation  $E = 4.10 P^{0.67}$ , and interpolation and extrapolation of the data for process weight rates in excess of 60,000 lb/hr shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40, \text{ where } E = \text{rate of emission in lb/hr and} \\ P = \text{process weight rate in tons/hr.}$$



STATE OF IDAHO  
DEPARTMENT OF HEALTH AND WELFARE  
DIVISION OF ENVIRONMENT

Pursuant to the Provisions  
of Section 39-115 of the Idaho Code,  
and the Rules and Regulations for the Con-  
trol of Air Pollution in Idaho,

FMC CORPORATION  
Permittee, including affiliates, if any

Located at

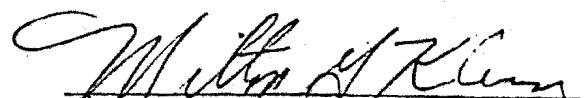
Pocatello, Idaho

is hereby granted permission to operate the Air  
Pollution Source(s) and Control Equipment specified  
herein provided the emission limitations, monitoring  
requirements and other conditions set forth in the  
Source Permit(s) are complied with.

Validation:

Issued February 26, 1980

Expiration February 26, 1985

  
Director

FMC CORPORATION located near at Pocatello, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment; Enclosed shale crushing operation and  
covered conveying system. Emissions controlled by 3 baghouses.

## Restrictions:

| Emission Point | Emission Characteristic | Emission Limitations | Monitoring Requirements                                     |
|----------------|-------------------------|----------------------|-------------------------------------------------------------|
| #1 Baghouse    | Particulate             | 1.0 lb/hr            | Stack test as Required by Operation and Maintenance Manual. |
| #2 Baghouse    | Particulate             | 2.0 lb/hr            |                                                             |
| #3 Baghouse    | Particulate             | 3.0 lb/hr            |                                                             |

## Conditions:

When visible emissions from the baghouse exceed 5% opacity, corrective action shall be implemented in accordance with procedure established in the Operation and Maintenance Manual. However, exceeding 5% opacity shall not be deemed a violation of this Permit.

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_

  
Authorizing Signature

FMC CORPORATION located n/w/r AT POCATELLO, IDAHO  
is hereby granted permission to operate the following air pollution  
source or control equipment; #1 calciner and cooler. Emissions from  
the calciner are controlled by two scrubbers in parallel; the emissions  
from the first cooler section are controlled by a baffled settling  
chamber and the exhaust gases are refed to the calciner as preheat air;  
the second cooler is divided into two parts - emissions controlled by a  
settling chamber and exhausted out a common stack.

## Restrictions:

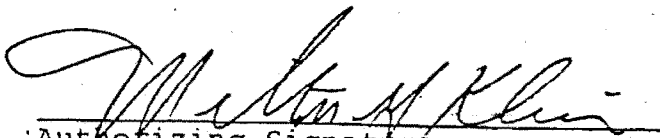
| Emission Point     | Emission Characteristic | Emission Limitations | Monitoring Requirements                                    |
|--------------------|-------------------------|----------------------|------------------------------------------------------------|
| Scrubber           | Particulate             | 38.0 lb/hr           | Stack Test as Required by Operation and Maintenance Manual |
| Scrubber           | Particulate             | 38.0 lb/hr           |                                                            |
| Split Cooler Stack | Particulate             | 16.0 lb/hr           |                                                            |
|                    | Particulate             | 16.0 lb/hr           |                                                            |

## Conditions:

Validation (if different from Facility Permit)

Issured \_\_\_\_\_

Expiration \_\_\_\_\_

  
Authorizing Signature

FMC CORPORATION located ~~near~~ at Pocatello, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment; #2 calciner and cooler. Emissions from  
the calciner are controlled by two scrubbers in parallel; the emissions  
from the first cooler section are controlled by a baffled settling  
chamber and the exhaust gases are refeed to the calciner as preheat air;  
the second cooler is divided into two parts - emissions controlled by  
a baffled settling chamber and exhausted out two stacks, one for each  
section.

## Restrictions:

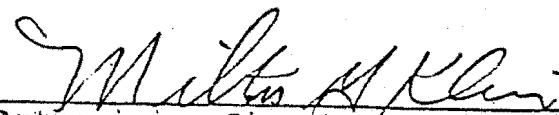
| Emission Point  | Emission Characteristic | Emission Limitations | Monitoring Requirements                                     |
|-----------------|-------------------------|----------------------|-------------------------------------------------------------|
| Scrubber #1     | Particulate             | 38.0 lb/hr           | Stack Test as Required by Operation and Maintenance Manual. |
| Scrubber # 2    | Particulate             | 38.0 lb/hr           |                                                             |
| Cooler Stack #1 | Particulate             | 36.0 lb/hr           |                                                             |
| Cooler Stack #2 | Particulate             | 25.0 lb/hr           |                                                             |

## Conditions:

Validation (if different from Facility Permit)

Issured \_\_\_\_\_

Expiration \_\_\_\_\_

  
\_\_\_\_\_  
Authorizing Signature

FMC CORPORATION located near at Pocatello, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment; Reclaim area and transfer of briquets  
with emissions controlled by 2 baghouses.

## Restrictions:

| Emission Point       | Emission Characteristic | Emission Limitations | Monitoring Requirements                                     |
|----------------------|-------------------------|----------------------|-------------------------------------------------------------|
| North Nodule Reclaim | Particulate             | 3.0 lb/hr            | Stack Test as Required by Operation and Maintenance Manual. |
| South Nodule Reclaim | Particulate             | 3.0 lb/hr            |                                                             |

## Conditions:

When visible emissions from the baghouse exceed 5% opacity, corrective action shall be implemented in accordance with procedure established in the Operation and Maintenance Manual. However, exceeding 5% opacity shall not be deemed a violation of this Permit.

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_

Wilton A. Khin  
Authorizing Signature

FMC CORPORATION located near at Pocatello, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment; Proportioning system, including nodules and  
silica, controlled by 3 baghouses (East and West Nodule Baggouses and  
Silo Baghouse)..

## Restrictions:

| Emission Point       | Emission Characteristic | Emission Limitations | Monitoring Requirements   |
|----------------------|-------------------------|----------------------|---------------------------|
| East Nodule Baghouse | Particulate             | 3.0 lb/hr            | Stack Test as Required by |
| West Nodule Baghouse | Particulate             | 3.0 lb/hr            | Operation and Maintenance |
| Silo Baghouse        | Particulate             | 3.0 lb/hr            | Manual                    |

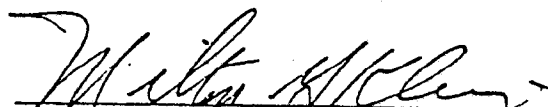
## Conditions:

When visible emissions from the baghouse exceed 5% opacity, corrective action shall be implemented in accordance with procedure established in the Operation and Maintenance Manual. However, exceeding 5% opacity shall not be deemed a violation of this Permit.

Validation (if different from Facility Permit)

Issured \_\_\_\_\_

Expiration \_\_\_\_\_

  
\_\_\_\_\_  
Authorizing Signature

FMC CORPORATION located near at Pocatello, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment; Furnace burdening system, controlled by  
two baghouses on the four furnaces.

## Restrictions:

| Emission Point     | Emission Characteristic | Emission Limitations | Monitoring Requirements                                     |
|--------------------|-------------------------|----------------------|-------------------------------------------------------------|
| #1 Burden Baghouse | Particulate             | 6.0 lb/hr            | Stack Test as Required by Operation and Maintenance Manual. |
| #2 Burden Baghouse | Particulate             | 6.0 lb/hr            |                                                             |

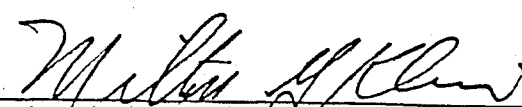
## Conditions:

When visible emissions from a baghouse exceed 5% opacity, corrective action shall be implemented in accordance with procedures established in the Operation and Maintenance Manual. However, exceeding 5% opacity shall not be deemed a violation of this Permit.

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_

  
\_\_\_\_\_  
Authorizing Signature

FMC CORPORATION located near at Pocatello, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment; Coke handling system with emissions  
controlled by a baghouse.

## Restrictions:

| Emission<br>Point | Emission<br>Characteristic | Emission<br>Limitations | Monitoring<br>Requirements                                              |
|-------------------|----------------------------|-------------------------|-------------------------------------------------------------------------|
| Baghouse          | Particulate                | 3.0 lb/hr               | Stack Test as<br>Required by<br>Operation and<br>Maintenance<br>Manual. |

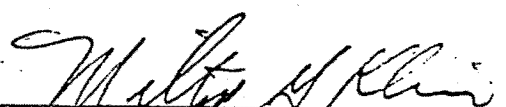
## Conditions:

When visible emissions from a baghouse exceed 5% opacity, corrective action shall be implemented in accordance with procedures established in the Operation and Maintenance Manual. However, exceeding 5% opacity shall not be deemed a violation of this Permit.

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_

  
\_\_\_\_\_  
Authorizing Signature



FMC CORPORATION located near at Pocatello, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment; #1 electric arc furnace, with tapping  
emissions controlled by 2 Medusa scrubbers in a crossover network  
followed by an Andersen control system.

## Restrictions:

| Emission<br>Point | Emission<br>Characteristic | Emission<br>Limitations | Monitoring<br>Requirements                                              |
|-------------------|----------------------------|-------------------------|-------------------------------------------------------------------------|
| Andersen system   | Particulate                | 5.0 lb/hr               | Stack Test as<br>Required by<br>Operation and<br>Maintenance<br>Manual. |

## Conditions:

the Andersen Control System  
When visible emissions from ~~a baghouse~~ exceed 5% opacity, corrective  
action shall be implemented in accordance with procedures established in  
the Operation and Maintenance Manual. However, exceeding 5% opacity  
shall not be deemed a violation of this Permit.

Validation (if different from Facility Permit)

Issured \_\_\_\_\_

Expiration \_\_\_\_\_

  
\_\_\_\_\_  
Authorizing Signature

FMC CORPORATION located near at Pocatello, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment; #2 electric arc furnace, with tapping  
emissions controlled by 2 Medusa scrubbers in a crossover network  
followed by an Andersen control system.

## Restrictions:

| Emission<br>Point | Emission<br>Characteristic | Emission<br>Limitations | Monitoring<br>Requirements                                              |
|-------------------|----------------------------|-------------------------|-------------------------------------------------------------------------|
| Andersen system   | Particulate                | 5.0 lb/hr               | Stack Test as<br>Required by<br>Operation and<br>Maintenance<br>Manual. |

## Conditions:

the Andersen Control System  
When visible emissions from ~~a/baghouse~~ exceed 5% opacity, corrective  
action shall be implemented in accordance with procedures established in  
the Operation and Maintenance Manual. However, exceeding 5% opacity  
shall not be deemed a violation of this Permit.

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_

  
\_\_\_\_\_  
Authorizing Signature

FMC CORPORATION located near at Pocatello, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment; #3 electric arc furnace, with tapping  
emissions controlled by 2 Medusa scrubbers in a crossover network  
followed by an Andersen control system.

## Restrictions:

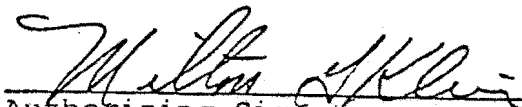
| Emission<br>Point | Emission<br>Characteristic | Emission<br>Limitations | Monitoring<br>Requirements                                              |
|-------------------|----------------------------|-------------------------|-------------------------------------------------------------------------|
| Andersen system   | Particulate                | 5.0 lb/hr               | Stack Test as<br>Required by<br>Operation and<br>Maintenance<br>Manual. |

Conditions: the Andersen Control System  
When visible emissions from ~~the Andersen Control System~~ exceed 5% opacity, corrective  
action shall be implemented in accordance with procedures established in  
the Operation and Maintenance Manual. However, exceeding 5% opacity  
shall not be deemed a violation of this Permit.

Validation (if different from Facility Permit)

Issured \_\_\_\_\_

Expiration \_\_\_\_\_

  
Authorizing Signature

FMC CORPORATION located near at Pocatello, Idaho is hereby granted permission to operate the following air pollution source or control equipment; #4 electric arc furnace, with tapping emissions controlled by 2 Medusa scrubbers in a crossover network followed by an Andersen control system.

## Restrictions:

| Emission Point  | Emission Characteristic | Emission Limitations | Monitoring Requirements                                     |
|-----------------|-------------------------|----------------------|-------------------------------------------------------------|
| Andersen system | Particulate             | 5.0 lb/hr            | Stack Test as Required by Operation and Maintenance Manual. |

## Conditions:

the Andersen Control System

When visible emissions from ~~A/Baghouse~~ exceed 5% opacity, corrective action shall be implemented in accordance with procedures established in the Operation and Maintenance Manual. However, exceeding 5% opacity shall not be deemed a violation of this Permit.

Validation (if different from Facility Permit)

Issured \_\_\_\_\_

Expiration \_\_\_\_\_

  
Authorizing Signature

FMC CORPORATION located now at Pocatello, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment; Dust Disposal system from FBD electrostatic  
precipitator controlled by a scrubber.

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## Restrictions:

| Emission<br>Point | Emission<br>Characteristic | Emission<br>Limitations | Monitoring<br>Requirements                                              |
|-------------------|----------------------------|-------------------------|-------------------------------------------------------------------------|
| Scrubber          | Particulate                | 22.0 lb/hr              | Stack Test as<br>Required by<br>Operation and<br>Maintenance<br>Manual. |

## Conditions:

Validation (if different from Facility Permit)

Issured \_\_\_\_\_

Expiration \_\_\_\_\_

  
\_\_\_\_\_  
Authorizing Signature

FMC CORPORATION located ~~near~~ at Pocatello, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment; carbon monoxide flare pit - used to control  
carbon monoxide pressure in furnace and calciner operations.

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## Restrictions:

| Emission<br>Point | Emission<br>Characteristic | Emission<br>Limitations | Monitoring<br>Requirements |
|-------------------|----------------------------|-------------------------|----------------------------|
|-------------------|----------------------------|-------------------------|----------------------------|

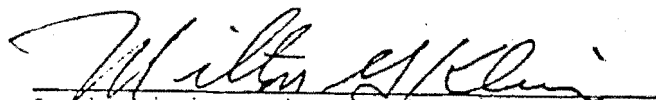
General provisions of the Rules and Regulations for the Control of  
Air Pollution in Idaho.

## Conditions:

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_

  
\_\_\_\_\_  
Authorizing Signature

FMC CORPORATION located near at Pocatello, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment; P4 dock, with wet wall electrostatic  
precipitator to control emissions from rail loading of phosphorus.

## Restrictions:

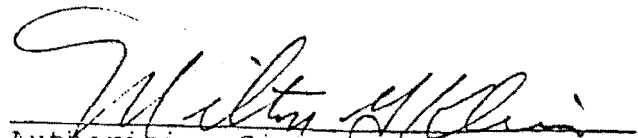
| Emission<br>Point | Emission<br>Characteristic | Emission<br>Limitations | Monitoring<br>Requirements                                              |
|-------------------|----------------------------|-------------------------|-------------------------------------------------------------------------|
| Precipitator      | Particulate                | 3.0 lb/hr               | Stack Test as<br>Required by<br>Operation and<br>Maintenance<br>Manual. |

## Conditions:

Validation (if different from Facility Permit)

Issured \_\_\_\_\_

Expiration \_\_\_\_\_

  
\_\_\_\_\_  
Authorizing Signature

FMC CORPORATION located near at Pocatello, Idaho

is hereby granted permission to operate the following air pollution  
source or control equipment; Three boilers fired by natural gas with  
distillate fuel oil as standby.

Restrictions:

| Emission<br>Point | Emission<br>Characteristic | Emission<br>Limitations | Monitoring<br>Requirements |
|-------------------|----------------------------|-------------------------|----------------------------|
|-------------------|----------------------------|-------------------------|----------------------------|

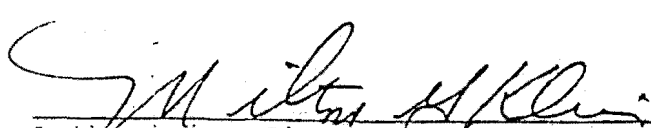
Sulfur limited in distillate fuel grades as defined in Section 1-1354  
of the Rules and Regulations for the Control of Air Pollution in Idaho.

Conditions:

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_

  
Authorizing Signature



FMC CORPORATION located near at Pocatello, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment; Nodule stockpiling ladders, controlled by  
a baghouse.

## Restrictions:

| Emission<br>Point     | Emission<br>Characteristic | Emission<br>Limitations | Monitoring<br>Requirements                                              |
|-----------------------|----------------------------|-------------------------|-------------------------------------------------------------------------|
| Stockpile<br>Baghouse | Particulate                | 3.0 lb/hr               | Stack Test as<br>Required by<br>Operation and<br>Maintenance<br>Manual. |

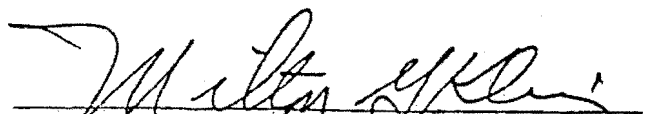
## Conditions:

When visible emissions from a baghouse exceed 5% opacity, corrective action shall be implemented in accordance with procedures established in the Operation and Maintenance Manual. However, exceeding 5% opacity shall not be deemed a violation of this Permit.

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_

  
\_\_\_\_\_  
Authorizing Signature

FMC CORPORATION located near at Pocatello, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment; All haul and access roads, parking areas,  
and other areas with potential for fugitive dust production.

## Restrictions:

| Emission<br>Point                 | Emission<br>Characteristic | Emission<br>Limitations  | Monitoring<br>Requirements                                                               |
|-----------------------------------|----------------------------|--------------------------|------------------------------------------------------------------------------------------|
| Plant roads and<br>parking areas. | Fugitive Dust              | See conditions<br>below. | Recording and<br>monitoring as<br>required by<br>Operation and<br>Maintenance<br>Manual. |

## Conditions:

1. All unpaved roads and parking areas shall be treated with water or a chemical suppressant in accordance with the procedures established in the Operation and Maintenance Manual.
2. All paved roads shall be maintained in a clean condition by wet sweeping or wet washing. The removal of dust shall be accomplished in accordance with the procedures established in the Operation and Maintenance Manual.

Validation (if different from Facility Permit)

Issued Expiration 

  
\_\_\_\_\_  
Authorizing Signature

## PART II GENERAL PROVISIONS

- A All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or non-compliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules and Regulations 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 and Regulations 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 laws for the control of air pollution.
- C The permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
- 1) To enter upon the permittee's 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 equipment or monitoring method required in this permit, and to sample any emission of pollutants.

D Except for data determined to be confidential under Section 39-111, Idaho Code, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Division of Environment.

E 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.

F In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Director.

G Until the expiration date, this permit shall be renewable annually, provided the permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit

such information within sixty (60) days after receipt of the Director's request shall cause the permit to be voided.

- II The Director may require the permittee to develop a list of Operation and Maintenance Procedures which must be approved by the Department. Such list of procedures shall become a part of this permit by reference, and the permittee shall adhere to all of the operation and maintenance procedures contained therein.
- I The permittee shall provide the appropriate regional office a minimum of five (5) days notice prior to the scheduled date of any emissions test required pursuant to this permit. The permittee shall notify the appropriate regional office of any change in the testing schedule and shall provide at least one (1) days notice prior to conducting any rescheduled test. Any records or data generated as a result of such compliance tests shall be made available to the Department upon request.

STATE OF IDAHO  
DEPARTMENT OF HEALTH AND WELFARE  
DIVISION OF ENVIRONMENT

Pursuant to the Provisions  
of Section 39-115 of the Idaho Code,  
and the Rules and Regulations for the Con-  
trol of Air Pollution in Idaho,

J. R. Simplot Company  
Permittee, including affiliates, if any

Post Office Box 912  
Located at

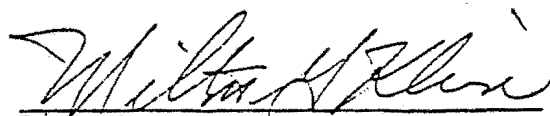
Pocatello, Idaho 83201

is hereby granted permission to operate the Air  
Pollution Source(s) and Control Equipment specified  
herein provided the emission limitations, monitoring  
requirements and other conditions set forth in the  
Source Permit(s) are complied with.

Validation:

Issued March 4, 1980

Expiration March 4, 1985

  
Director

J. R. Simplot Company located ~~near~~ at Pocatello, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment; 100 calciner with emissions controlled  
by cyclones followed by a high efficiency scrubber.

## Restrictions:

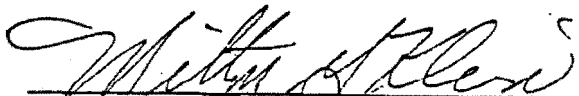
| Emission<br>Point | Emission<br>Characteristic | Emission<br>Limitations | Monitoring<br>Requirements                                             |
|-------------------|----------------------------|-------------------------|------------------------------------------------------------------------|
| Scrubber          | Particulate                | 3.8 lb/hour             | Stack Test as<br>required by<br>Operation and<br>Maintenance<br>Manual |

## Conditions:

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_

  
\_\_\_\_\_

Authorizing Signature

J. R. Simplot Company located ~~near~~ at Pocatello, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment; 200 calciner with emissions controlled  
by cyclones followed by a high efficiency scrubber.

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## Restrictions:

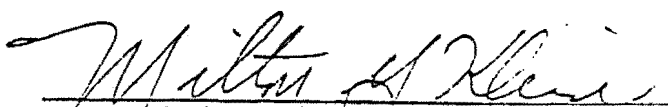
| Emission<br>Point | Emission<br>Characteristic | Emission<br>Limitations | Monitoring<br>Requirements                                             |
|-------------------|----------------------------|-------------------------|------------------------------------------------------------------------|
| Scrubber          | Particulate                | 41.7 lb/hour            | Stack Test as<br>required by<br>Operation and<br>Maintenance<br>Manual |

## Conditions:

Validation (if different from Facility Permit)

Issured \_\_\_\_\_

Expiration \_\_\_\_\_

  
Authorizing Signature



J. R. Simplot Company located ~~near~~ Pocatello, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment; 300 calciner with emissions controlled  
cyclones followed by an electrostatic precipitator.

## Restrictions:

| Emission<br>Point | Emission<br>Characteristic | Emission<br>Limitations | Monitoring<br>Requirements                                             |
|-------------------|----------------------------|-------------------------|------------------------------------------------------------------------|
| Precipitator      | Particulate                | 51.0 lb/hour            | Stack Test as<br>Required by<br>Operation and<br>Maintenance<br>Manual |

## Conditions:

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_

  
\_\_\_\_\_  
Authorizing Signature

J. R. Simplot Company located near at Pocatello, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment; Numbers 1 and 4 roller mills with emissions  
controlled by a cyclone followed by a baghouse

## Restrictions:

| Emission<br>Point | Emission<br>Characteristic | Emission<br>Limitations | Monitoring<br>Requirements                                             |
|-------------------|----------------------------|-------------------------|------------------------------------------------------------------------|
| Baghouse          | Particulate                | 6.6 lb/hour             | Stack Test as<br>Required by<br>Operation and<br>Maintenance<br>Manual |

## Conditions:

When visible emissions from the baghouse exceed 5% opacity, corrective action shall be implemented in accordance with procedures established in the Operation and Maintenance Manual. However, exceeding 5% opacity shall not be deemed a violation of this permit.

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_

Milton H. Klesi  
Authorizing Signature

J. R. Simplot Company located ~~near~~ at Pocatello, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment; Number 2 roller mill with emissions  
controlled by a baghouse

## Restrictions:

| Emission Point | Emission Characteristic | Emission Limitations | Monitoring Requirements                                    |
|----------------|-------------------------|----------------------|------------------------------------------------------------|
| Baghouse       | Particulate             | 1.8 lb/hour          | Stack Test as Required by Operation and Maintenance Manual |

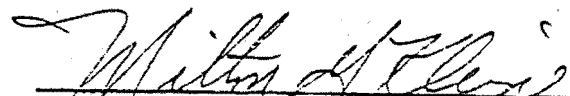
## Conditions:

When visible emissions from the baghouse exceed 5% opacity, corrective action shall be implemented in accordance with procedures established in the Operation and Maintenance Manual. However, exceeding 5% opacity shall not be deemed a violation of this permit.

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_

  
\_\_\_\_\_  
Authorizing Signature

J. R. Simplot Company located ~~near~~ at Pocatello, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment; Number 5 roller mill with emissions  
controlled by a cyclone followed by a baghouse

## Restrictions:

| Emission Point | Emission Characteristic | Emission Limitations | Monitoring Requirements                                    |
|----------------|-------------------------|----------------------|------------------------------------------------------------|
| Baghouse       | Particulate             | 12.0 lb/hour         | Stack Test as Required by Operation and Maintenance Manual |

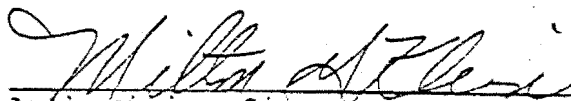
## Conditions:

When visible emissions from the baghouse exceed 5% opacity, corrective action shall be implemented in accordance with procedures established in the Operation and Maintenance Manual. However, exceeding 5% opacity shall not be deemed a violation of this permit.

Validation (if different from Facility Permit)

Issured \_\_\_\_\_

Expiration \_\_\_\_\_

  
\_\_\_\_\_  
Authorizing Signature

J. R. Simplot Company located ~~near~~ at Pocatello, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment; Number 6, 7, and 8 roller mills with  
emissions controlled by a cyclone followed by a baghouse

## Restrictions:

| Emission<br>Point | Emission<br>Characteristic | Emission<br>Limitations | Monitoring<br>Requirements                                             |
|-------------------|----------------------------|-------------------------|------------------------------------------------------------------------|
| Baghouse          | Particulate                | 14.8 lb/hour            | Stack Test as<br>Required by<br>Operation and<br>Maintenance<br>Manual |

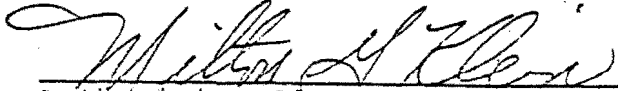
## Conditions:

When visible emissions from the baghouse exceed 5% opacity, corrective action shall be implemented in accordance with procedures established in the Operation and Maintenance Manual. However, exceeding 5% opacity shall not be deemed a violation of this permit.

Validation (if different from Facility Permit)

Issured \_\_\_\_\_

Expiration \_\_\_\_\_

  
\_\_\_\_\_  
Authorizing Signature

J. R. Simplot Company located near at Pocatello, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment; 200 phosphoric acid plant with emissions  
controlled by a scrubber.

## Restrictions:

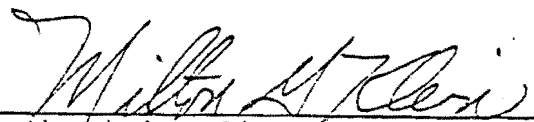
| Emission<br>Point | Emission<br>Characteristic | Emission<br>Limitations | Monitoring<br>Requirements                                             |
|-------------------|----------------------------|-------------------------|------------------------------------------------------------------------|
| Scrubber          | Particulate                | 8.8 lb/hour             | Stack Test as<br>Required by<br>Operation and<br>Maintenance<br>Manual |

## Conditions:

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_

  
\_\_\_\_\_  
Authorizing Signature

J. R. Simplot Company located ~~near~~ at Pocatello, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment; 300 phosphoric acid plant with emissions  
controlled by a packed bed scrubber, and a venturi scrubber in parallel.

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## Restrictions:

| Emission Point      | Emission Characteristic | Emission Limitations          | Monitoring Requirements                                                  |
|---------------------|-------------------------|-------------------------------|--------------------------------------------------------------------------|
| Packed bed Scrubber | Particulate             | 10.8 lb/hour from both Stacks | Simultaneous Stack Tests as Required by Operation and Maintenance Manual |
| Venturi Scrubber    | Particulate             |                               |                                                                          |

## Conditions:

Validation (if different from Facility Permit)

Effective \_\_\_\_\_

Expiration \_\_\_\_\_

  
\_\_\_\_\_  
Authorizing Signature

J. R. Simplot Company located near at Pocatello, Idaho

is hereby granted permission to operate the following air pollution source or control equipment; Ammonium sulfate drying and cooling with emissions controlled by a cyclone for the dryer and a cyclone for the cooler.

Restrictions:

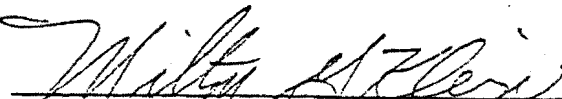
| Emission Point | Emission Characteristic | Emission Limitations         | Monitoring Requirements                                                  |
|----------------|-------------------------|------------------------------|--------------------------------------------------------------------------|
| Dryer Cyclone  | Particulate             | 3.7 lb/hour from both stacks | Simultaneous Stack Tests as Required by Operation and Maintenance Manual |
| Cooler Cyclone | Particulate             |                              |                                                                          |

Conditions:

Validation (if different from Facility Permit)

Effective \_\_\_\_\_

Expiration \_\_\_\_\_

  
Authorizing Signature



J. R. Simplot Company located near at Pocatello, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment; 100 mono ammonium phosphate plant;  
reactor/granulator emissions are controlled by a venturi scrubber (#1),  
followed by a cyclonic scrubber (#1), which is followed with a fluoride  
scrubber; the dryer emissions are controlled by a venturi scrubber (#2),  
followed by a cyclonic scrubber (#2); dust emissions from sizing screens,  
polishing screens and product handling are controlled by a baghouse.

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Restrictions:

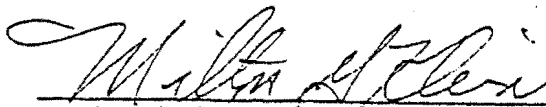
| Emission Point       | Emission Characteristic | Emission Limitations            | Monitoring Requirements                                                                 |
|----------------------|-------------------------|---------------------------------|-----------------------------------------------------------------------------------------|
| Fluoride Scrubber    | Particulate             | 25.8 lb/hour<br>from all stacks | Simultaneous<br>Stack Tests as<br>Required by<br>Operation and<br>Maintenance<br>Manual |
| #2 Cyclonic Scrubber | Particulate             |                                 |                                                                                         |
| Baghouse             | Particulate             |                                 |                                                                                         |

Conditions:

Validation (if different from Facility Permit)

Effective \_\_\_\_\_

Expiration \_\_\_\_\_

  
\_\_\_\_\_  
Authorizing Signature

J. R. Simplot Company located ~~near~~ at Pocatello, Idaho is hereby granted permission to operate the following air pollution source or control equipment; Diammonium phosphate reactor, granulator, dryer and cooler. Reactor and granulator emissions are controlled by a venturi scrubber followed by a cyclonic scrubber. Dryer emissions are controlled by a cyclone then a venturi scrubber, next a cyclonic scrubber that is used in common with the reactor and granulator, then a mist eliminator. Cooler emissions are controlled by a cyclone, then a baghouse.

## Restrictions:

| Emission Point                       | Emission Characteristic | Emission Limitations          | Monitoring Requirements                                                  |
|--------------------------------------|-------------------------|-------------------------------|--------------------------------------------------------------------------|
| Dryer, Reactor & Granulator Scrubber | Particulate             | 85.4 lb/hour from both Stacks | Simultaneous Stack Tests as Required by Operation and Maintenance Manual |
| Cooler Baghouse                      | Particulate             |                               |                                                                          |

## Conditions:

Validation (if different from Facility Permit)

Effective \_\_\_\_\_

Expiration \_\_\_\_\_

  
\_\_\_\_\_  
Authorizing Signature

J. R. Simplot Company located near at Pocatello, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment; Triple super phosphate plant with dryer  
emissions controlled by a cyclone followed by a cyclonic scrubber,  
then a centrifield scrubber. Dust emissions from material handling  
equipment are controlled by a baghouse.

## Restrictions:

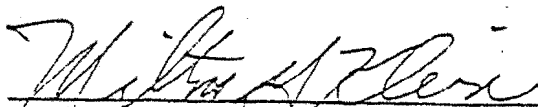
| Emission Point       | Emission Characteristic | Emission Limitations          | Monitoring Requirements                                                  |
|----------------------|-------------------------|-------------------------------|--------------------------------------------------------------------------|
| Centrifield Scrubber | Particulate             | 23.8 lb/hour from both stacks | Simultaneous Stack Tests as Required by Operation and Maintenance Manual |
| Baghouse             | Particulate             |                               |                                                                          |

## Conditions:

Validation (if different from Facility Permit)

Effective \_\_\_\_\_

Expiration \_\_\_\_\_

  
\_\_\_\_\_  
Authorizing Signature

J. R. Simplot Company located ~~near~~ at Pocatello, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment; Nitrate solutions plant

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## Restrictions:

| Emission<br>Point | Emission<br>Characteristic | Emission<br>Limitations | Monitoring<br>Requirements |
|-------------------|----------------------------|-------------------------|----------------------------|
|-------------------|----------------------------|-------------------------|----------------------------|

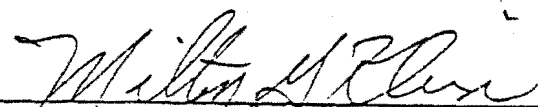
General provisions of the Rules and Regulations for the Control of  
Air Pollution in Idaho.

## Conditions:

Validation (if different from Facility Permit)

Effective \_\_\_\_\_

Expiration \_\_\_\_\_

  
\_\_\_\_\_  
Authorizing Signature

J. R. Simplot Company located near at Pocatello, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment; Nitric Acid Plant

Restrictions:

| Emission Point | Emission Characteristic | Emission Limitations                   | Monitoring Requirements                                                |
|----------------|-------------------------|----------------------------------------|------------------------------------------------------------------------|
| Stack          | NOx(expressed as NO2)   | 3 pounds per ton of 100% acid produced | Continuous, Stack Test as Required by Operation and Maintenance Manual |
|                | Opacity                 | 10%                                    |                                                                        |

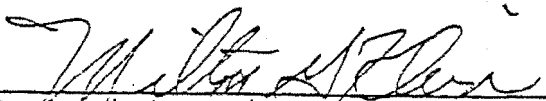
Conditions:

This source is subject to new source performance standards.

Validation (if different from Facility Permit)

Effective \_\_\_\_\_

Expiration \_\_\_\_\_

  
\_\_\_\_\_  
Authorizing Signature

J. R. Simplot Company located near at Pocatello, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment; Ammonia Plant

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## Restrictions:

| Emission<br>Point | Emission<br>Characteristic | Emission<br>Limitations | Monitoring<br>Requirements |
|-------------------|----------------------------|-------------------------|----------------------------|
|-------------------|----------------------------|-------------------------|----------------------------|

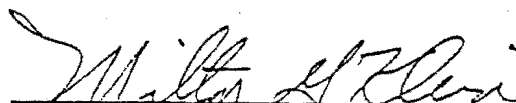
General provisions of the Rules and Regulations for the Control of  
Air Pollution in Idaho.

## Conditions:

Validation (if different from Facility Permit)

Effective \_\_\_\_\_

Expiration \_\_\_\_\_

  
\_\_\_\_\_  
Authorizing Signature

J. R. Simplot Company located ~~near~~ at Pocatello, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment; Keeler Boiler fired by natural gas with  
distillate fuel oil as stand by.

## Restrictions:

| Emission<br>Point | Emission<br>Characteristic | Emission<br>Limitations | Monitoring<br>Requirements |
|-------------------|----------------------------|-------------------------|----------------------------|
|-------------------|----------------------------|-------------------------|----------------------------|

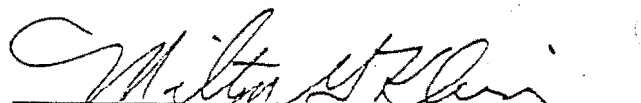
Sulfur limitations for distillate fuel grades as defined in Section  
1-1354 of the Rules and Regulations for the Control of Air Pollution  
in Idaho.

## Conditions:

Validation (if different from Facility Permit)

Effective \_\_\_\_\_

Expiration \_\_\_\_\_

  
\_\_\_\_\_  
Authorizing Signature

## PART II GENERAL PROVISIONS

- A All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or non-compliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules and Regulations 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 and Regulations 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 laws for the control of air pollution.
- C The permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
- 1) To enter upon the permittee's 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 equipment or monitoring method required in this permit, and to sample any emission of pollutants.

D Except for data determined to be confidential under Section 39-111, Idaho Code, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Division of Environment.

E 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.

F In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Director.

G Until the expiration date, this permit shall be renewable annually, provided the permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit

such information within sixty (60) days after receipt of the Director's request shall cause the permit to be voided.

- H The Director may require the permittee to develop a list of Operation and Maintenance Procedures which must be approved by the Department. Such list of procedures shall become a part of this permit by reference, and the permittee shall adhere to all of the operation and maintenance procedures contained therein.
- I The permittee shall provide the appropriate regional office a minimum of five (5) days notice prior to the scheduled date of any emissions test required pursuant to this permit. The permittee shall notify the appropriate regional office of any change in the testing schedule and shall provide at least one (1) days notice prior to conducting any rescheduled test. Any records or data generated as a result of such compliance tests shall be made available to the Department upon request.

## PART III FUGITIVE EMISSION CONTROL

The permittee shall reduce fugitive emissions from the following sources in accordance with the schedules below:

A. Ammonium Phosphate Plant

Permittee shall install equipment to collect and control fugitive emissions from materials handling equipment on or before July 1, 1980.

B. Calcining Building

Permittee shall install equipment to collect and control fugitive emissions from materials handling equipment on or before February 1, 1981.

C. Mill Building

Permittee shall install equipment to collect and control fugitive emissions from materials handling equipment in accordance with the following compliance schedule:

- 1) By March 1, 1981, submit a final emission control plan, including equipment design specifications and drawings for approval by the Department.
- 2) By June 1, 1981, let contracts or issue purchase orders for equipment necessary to control fugitive emissions in accordance with plans approved by the Department.
- 3) By June 1, 1982, initiate construction of control equipment.

- 4) By September 1, 1982, complete construction of control equipment.
- 5) By October 1, 1982, demonstrate compliance with the final control plan approved by the Department.



## STATE OF IDAHO

## DEPARTMENT OF HEALTH AND WELFARE

## DIVISION OF ENVIRONMENT

Pursuant to the Provisions  
of Section 39-115 of the Idaho Code,  
and the Rules and Regulations for the Con-  
trol of Air Pollution in Idaho,

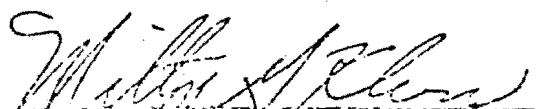
Idaho Portland Cement Company  
Permittee, including affiliates, if any

Inkom, Idaho 83245  
Located at

\_\_\_\_\_

is hereby granted permission to operate the Air  
Pollution Source(s) and Control Equipment specified  
herein provided the emission limitations, monitoring  
requirements and other conditions set forth in the  
Source Permit(s) are complied with.

Validation:

Issued 7/18/79Expiration 7/17/84

## PART I

SOURCE PERMIT NO. 13-0080-0004-01Page 2 of 18Idaho Portland Cement Company located at Inkom, Idaho

is hereby granted permission to operate the following air pollution  
source or control equipment: Number 1 Allis Chalmers coal/gas fired  
kiln controlled by a multiclone system followed by a Cottrell  
electrostatic precipitator.

## Restrictions:

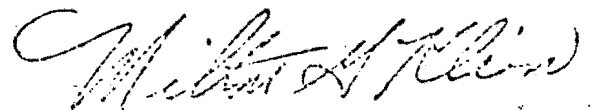
| Emission<br>Point | Emission<br>Characteristic | Emission<br>Limitations             | Monitoring<br>Requirements                                         |
|-------------------|----------------------------|-------------------------------------|--------------------------------------------------------------------|
| ESP Exhaust Stack | Particulate                | See Part III                        | Stack Test as<br>required by<br>Operation and<br>Maintenance Manua |
| ESP Exhaust Stack | SO <sub>2</sub>            | Sulfur content<br>of coal $\leq$ 1% |                                                                    |

## Conditions:

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_



## PART I

SOURCE PERMIT NO. 13-0080-0004-02Page 3 of 18Idaho Portland Cement Company located at Inkom, Idaho

is hereby granted permission to operate the following air pollution source or control equipment: Number 2 F.L. Smith coal/gas fired kiln controlled by a multiclone system followed by a Cottrell electros precipitator.

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## Restrictions:

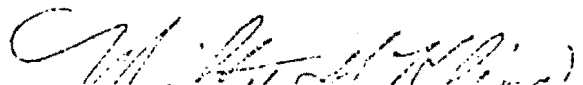
| Emission Point    | Emission Characteristic | Emission Limitations             | Monitoring Requirements                                    |
|-------------------|-------------------------|----------------------------------|------------------------------------------------------------|
| ESP Exhaust Stack | Particulate             | See Part III                     | Stack Test as required by Operation and Maintenance Manua. |
| ESP Exhaust Stack | SO <sub>2</sub>         | Sulfur content of coal $\leq$ 1% |                                                            |

## Conditions:

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_





PART I

SOURCE PERMIT NO. 13-0080-0004-03

Page 4 of 18

Idaho Portland Cement Company located at Inkom, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment: No. 1 Fuller cooler controlled by  
a baghouse.

Restrictions:

| Emission Point   | Emission Characteristic | Emission Limitations                      | Monitoring Requirements                                    |
|------------------|-------------------------|-------------------------------------------|------------------------------------------------------------|
| Baghouse Exhaust | Particulate             | 0.10 Pounds per ton of material processed | Stack Test as required by Operation and Maintenance Manual |

Conditions:

When a visible emission from the baghouse exceeds 5% opacity corrective action is to be implemented.

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_

*M. L. Klein*

## PART I

SOURCE PERMIT NO. 13-0080-0004-04Page 5 of 18Idaho Portland Cement Company located at Inkom, Idaho

is hereby granted permission to operate the following air pollution  
source or control equipment: Clinker elevator and silo storage  
controlled by two baghouses.

## Restrictions:

| Emission Point            | Emission Characteristic | Emission Limitations                      | Monitoring Requirements                                    |
|---------------------------|-------------------------|-------------------------------------------|------------------------------------------------------------|
| Elevator Baghouse Exhaust | Particulate             | 0.10 Pounds per ton of material processed | Stack Test as required by Operation and Maintenance Manual |
| Silo Baghouse Exhaust     | Particulate             | 0.10 Pounds per ton of material processed |                                                            |

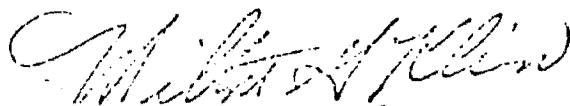
## Conditions:

When a visible emission from the baghouse exceeds 5% opacity corrective action is to be implemented.

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_



## PART I

SOURCE PERMIT NO. 13-0080-0004-06Page 6 of 18Idaho Portland Cement Company located at Inkom, Idaho

is hereby granted permission to operate the following air pollution  
source or control equipment: #1 and #2 mill controlled by a baghouse.

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## Restrictions:

| Emission<br>Point | Emission<br>Characteristic | Emission<br>Limitations                            | Monitoring<br>Requirements                                          |
|-------------------|----------------------------|----------------------------------------------------|---------------------------------------------------------------------|
| Baghouse Exhaust  | Particulate                | 0.10 Pounds<br>per ton of<br>material<br>processed | Stack Test as<br>required by<br>Operation and<br>Maintenance Manual |

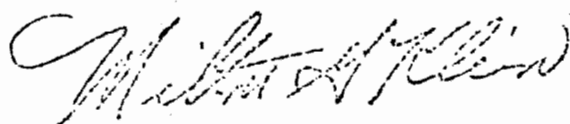
## Conditions:

When a visible emission from the baghouse exceeds 5% opacity,  
corrective action is to be implemented.

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_



PART I

SOURCE PERMIT NO. 13-0080-0004-06

Page 7 of 18

Idaho Portland Cement Company located at Inkom, Idaho

is hereby granted permission to operate the following air pollution  
source or control equipment: #3 Mill controlled by a baghouse

Restrictions:

| Emission Point   | Emission Characteristic | Emission Limitations                      | Monitoring Requirements                                   |
|------------------|-------------------------|-------------------------------------------|-----------------------------------------------------------|
| Baghouse Exhaust | Particulate             | 0.10 Pounds per ton of material processed | Stack Test as required by Operatic and Maintenance Manual |

Conditions:

When visible emissions from the baghouse exceed 5% opacity, corrective action is to be implemented.

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_

*M. A. Klein*

PART I

SOURCE PERMIT NO. 13-0020-0004-07

Page 8 of 18

Idaho Portland Cement Company located at Inkom, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment: Cement transfer to bulk loadout storage  
controlled by a baghouse

Restrictions:

| Emission<br>Point | Emission<br>Characteristic | Emission<br>Limitations                            | Monitoring<br>Requirements                                          |
|-------------------|----------------------------|----------------------------------------------------|---------------------------------------------------------------------|
| Baghouse Exhaust  | Particulate                | 0.10 Pounds<br>per ton of<br>material<br>processed | Stack Test as<br>required by<br>Operation and<br>Maintenance Manual |

Conditions:

When visible emissions from the baghouse exceed 5% opacity, corrective action is to be implemented.

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_

*M. Peter H. Klein*

SOURCE PERMIT NO. 13-0080-0004-02

Page 9 of 18

Idaho Portland Cement Company located at Inkom, Idaho

is hereby granted permission to operate the following air pollution  
source or control equipment: Bulk loading area baghouse

## Restrictions:

| Emission Point   | Emission Characteristic | Emission Limitations                      | Monitoring Requirements                                    |
|------------------|-------------------------|-------------------------------------------|------------------------------------------------------------|
| Baghouse Exhaust | Particulate             | 0.10 Pounds per ton of material processed | Stack Test as required by Operation and Maintenance Manual |

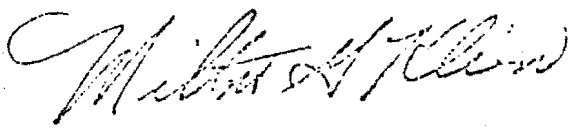
## Conditions:

When visible emissions from the baghouse exceed 5% opacity, corrective action is to be implemented.

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_

  
Authorized Signature

PART I

SOURCE PERMIT NO. 13-0020-0004-09

Page 10 of 18

Idaho Portland Cement Company located at Inkom, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment: Cement storage silos controlled by a  
baghouse

Restrictions:

| Emission<br>Point | Emission<br>Characteristic | Emission<br>Limitations                            | Monitoring<br>Requirements                                     |
|-------------------|----------------------------|----------------------------------------------------|----------------------------------------------------------------|
| Baghouse Exhaust  | Particulate                | 0.10 Pounds<br>per ton of<br>material<br>processed | Stack Test as requi:<br>by Operation and<br>Maintenance Manual |

Conditions:

When visible emissions from the baghouse exceed 5% opacity, corrective  
action is to be implemented.

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_

*M. J. Klein*

PART 1

SOURCE PERMIT NO. 13-0030-0004-10

Page 11 of 13

Idaho Portland Cement Company located at Inkom, Idaho

is hereby granted permission to operate the following air pollution  
source or control equipment: packhouse and packaging operation  
controlled by a baghouse

Restrictions:

| Emission Point   | Emission Characteristic | Emission Limitations                      | Monitoring Requirements                                   |
|------------------|-------------------------|-------------------------------------------|-----------------------------------------------------------|
| Baghouse Exhaust | Particulate             | 0.10 Pounds per ton of material processed | Stack Test as required by Operator and Maintenance Manual |

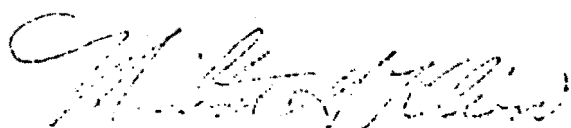
Conditions:

When visible emissions exceed 5% opacity from the baghouse, corrective action is to be implemented.

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_





PART I

SOURCE PERMIT NO. 13-0080-0004-11

Page 12 of 18

Idaho Portland Cement Company located at Inkom, Idaho

is hereby granted permission to operate the following air pollution  
source or control equipment: Raw Material crushing, screening and  
transfer to storage silos.

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Restrictions:

| Emission<br>Point                 | Emission<br>Characteristic | Emission<br>Limitations                                                                                                                         | Monitoring<br>Requirements |
|-----------------------------------|----------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------|
| Crusher, Screens<br>and Conveyors | Particulate                | Compliance with sections 1-1251<br>and 1-1252 of the <u>Rules and</u><br><u>Regulations for the Control of</u><br><u>Air Pollution in Idaho</u> |                            |

Conditions:

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_

*M. Harold Kline*

PART I

SOURCE PERMIT NO. 13-0080-0004-12

Page 13 of 18

Idaho Portland Cement Company located at Inkom, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment: Railcar clinker receiving area (bottom  
dump unloading hopper and conveying).

Restrictions:

| Emission<br>Point   | Emission<br>Characteristic | Emission<br>Limitations                                                                                                                         | Monitoring<br>Requirements |
|---------------------|----------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------|
| Dump Area Conveying | Particulate                | Compliance with section 1-1251<br>and 1-1252 of the <u>Rules and</u><br><u>Regulations for the Control of</u><br><u>Air Pollution In Idaho.</u> |                            |

Conditions:

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_

*M. R. [Signature]*

## PART I

SOURCE PERMIT NO. 13-0080-0004-13Page 14 of 18Idaho Portland Cement Co. located at Inkom, Idaho

is hereby granted permission to operate the following air pollution  
source or control equipment: Coal receiving and storage area  
(bottom dump coal hopper, transfer and storage).

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## Restrictions:

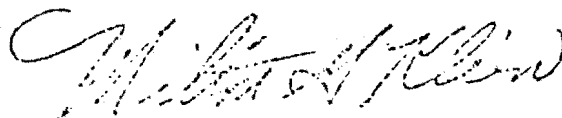
| Emission<br>Point                      | Emission<br>Characteristic | Emission<br>Limitations                                                                                                            | Monitoring<br>Requirements |
|----------------------------------------|----------------------------|------------------------------------------------------------------------------------------------------------------------------------|----------------------------|
| Dump area,<br>Conveying and<br>Storage | Particulate                | Compliance with sections 1-1251 and<br>1-1252 of the Rules and Regulations<br>for the Control of Air Pollution in<br><u>Idaho.</u> |                            |

## Conditions:

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_



## PART II GENERAL PROVISIONS

- A All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant identified in this permit in excess of that authorized, or non-compliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules and Regulations 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 by breakdowns as defined in the Rules and Regulations 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 laws.
- C The permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
- 1) To enter upon the permittee's 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 equipment or monitoring method required in this permit, and to sample any emission of pollutants.

D Except for data determined to be confidential under section 39-111, Idaho Code, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Division of Environment.

E Nothing in this permit shall be construed to preclude institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties established pursuant to any applicable federal, state, or local law or regulation.

F In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Director.

- 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.
- H Until the expiration date, this permit shall be renewable annually, provided the permittee submits any and all information required by the Director to assess the air pollution impact of the equipment for which the permit is granted. Failure to submit such information within sixty (60) days after receipt of the Director's request shall cause the permit to be voided.
- I The Department may require the permittee to develop an Operational and Maintenance Manual which must be approved by the Director. Such Manual shall become a part of this permit by reference, and failure to comply with the terms of the Manual shall constitute a violation of this permit.
- J The permittee shall provide the appropriate regional office a minimum of five (5) days notice prior to conducting any compliance tests required pursuant to this permit. Any records or data generated as a result of such compliance tests shall be made available to the Department upon request.

PART III

EMISSION LIMITATIONS

FACILITY PERMIT NO. 13-0080-0004-00

Page 18 of 18

1. Allowable Mass Emission Rate (Effective on Issuance of Permit Unless Otherwise Noted)

A person shall not discharge into the atmosphere from any source operating prior to February 1, 1979 particulate matter in excess of the amount shown by the following equations:

If PW is less than 17,000 pounds per hour,

$$E = .045 (PW)^{0.60}$$

If PW is equal to or greater than 17,000 pounds per hour,

$$E = 1.12 (PW)^{0.27}$$

Where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour.

2. Allowable Grain Loading Rate (Effective January 1, 1981)

A person shall not discharge into the atmosphere from any source, particulate matter in excess of the concentration shown by the following equation:

$$C = 3.0 (V)^{-0.35}$$

Where C is the allowable concentration in grains per standard dry cubic foot of effluent gas and V is the volume of the effluent gas in standard dry cubic feet per minute.

K.1

Page 1 of 8

STATE OF IDAHO

DEPARTMENT OF HEALTH AND WELFARE

DIVISION OF ENVIRONMENT

Pursuant to the Provisions  
of Section 39-115 of the Idaho Code,  
and the Rules and Regulations for the Con-  
trol of Air Pollution in Idaho,

J. R. Simplot Company  
Permittee, including affiliates, if any

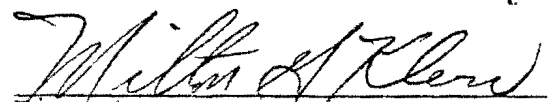
\_\_\_\_\_  
Located at

Conda, Idaho 83230

is hereby granted permission to operate the Air  
Pollution Source(s) and Control Equipment specified  
herein provided the emission limitations, monitoring  
requirements and other conditions set forth in the  
Source Permit(s) are complied with.

Validation:

Issued 7/18/79Expiration 7/17/84

  
Director



PART I

SOURCE PERMIT NO. 13-0420-0021-01

Page 2 of 8

J. R. Simplot Company located at Conda, Idaho

is hereby granted permission to operate the following air pollution source or control equipment: Phosphate ore dryer, emissions controlled by a cyclone followed by 4 higher efficiency cyclones in parallel.

Restrictions:

| Emission Point | Emission Characteristic | Emission Limitations | Monitoring Requirements                                  |
|----------------|-------------------------|----------------------|----------------------------------------------------------|
| Dryer Exhaust  | Particulate             | See Part IV          | Stack Test as Required by Operation and Maintenance Manu |

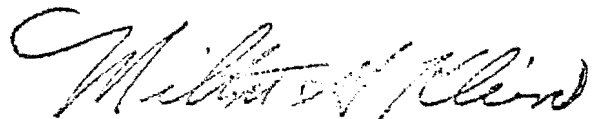
Conditions:

Total process weight is that amount, in pounds per hour, being fed to the dryer. Total actual emissions are calculated by adding the emissions from the above source(s). This condition becomes effective on November 30, 1981, see Part III for compliance schedule.

Validation (if different from Facility Permit)

Effective 11/30/81

Expiration \_\_\_\_\_



PART I

SOURCE PERMIT NO. 13-0420-0021-02

Page 3 of 8

J. R. Simplot Company located at Conda, Idaho

is hereby granted permission to operate the following air pollution  
source or control equipment: Calciner with emissions controlled by  
a scrubber.

Restrictions:

| Emission<br>Point | Emission<br>Characteristic | Emission<br>Limitations | Monitoring<br>Requirements                                        |
|-------------------|----------------------------|-------------------------|-------------------------------------------------------------------|
| Scrubber          | Particulate                | See Part III            | Stack Test as<br>Required by<br>Operation and<br>Maintenance Manu |

Conditions:

Total process weight is that amount, in pounds per hour, being fed  
to the calciner. Total actual emissions are calculated by adding  
the emissions from the above source (s).

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_



## PART II GENERAL PROVISIONS

- A All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant identified in this permit in excess of that authorized, or non-compliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules and Regulations 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 by breakdowns as defined in the Rules and Regulations 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 laws.
- C The permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
- 1) To enter upon the permittee's 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 equipment or monitoring method required in this permit, and to sample any emission of pollutants.
- D Except for data determined to be confidential under Section 39-111, Idaho Code, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Division of Environment.
- E 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.
- F In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Director.
- G Until the expiration date, this permit shall be renewable annually, provided the permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit

such information within sixty (60) days after receipt of the Director's request shall cause the permit to be voided.

- H The Director may require the permittee to develop a list of Operation and Maintenance Procedures which must be approved by the Department. Such list of procedures shall become a part of this permit by reference, and the permittee shall adhere to all of the operation and maintenance procedures contained therein.
- I The permittee shall provide the appropriate regional office a minimum of five (5) days notice prior to the scheduled date of any emissions test required pursuant to this permit. The permittee shall notify the appropriate regional office of any change in the testing schedule and shall provide at least one (1) days notice prior to conducting any rescheduled test. Any records or data generated as a result of such compliance tests shall be made available to the Department upon request.

PART III

SOURCE PERMIT NO. 13-0420-002

Page 7 of 8

Compliance Schedule for Conda Calciner operated by J. R. Simplot Company.

- |                                                  |                   |
|--------------------------------------------------|-------------------|
| 1. Complete Feasibility Study                    | July 31, 1980     |
| 2. Complete Preliminary Engineering              | October 31, 1980  |
| 3. Engineering Completed                         | March 31, 1981    |
| 4. Order Equipment                               | April 30, 1981    |
| 5. Begin Construction                            | June 30, 1981     |
| 6. Complete Construction and<br>Prove Compliance | November 30, 1981 |

## PART III EMISSION LIMITATIONS

1. Allowable Mass Emission Rate (Effective on Issuance of Permit Unless Otherwise Noted)

A person shall not discharge into the atmosphere from any source operating prior to February 1, 1979 particulate matter in excess of the amount shown by the following equations:

If PW is less than 17,000 pounds per hour,

$$E = .045 (PW)^{0.60}$$

If PW is equal to or greater than 17,000 pounds per hour,

$$E = 1.12 (PW)^{0.27}$$

Where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour.

## STATE OF IDAHO

## DEPARTMENT OF HEALTH AND WELFARE

## DIVISION OF ENVIRONMENT

Pursuant to the Provisions  
of Section 39-115 of the Idaho Code,  
and the Rules and Regulations for the Con-  
trol of Air Pollution in Idaho,

Beker Industries  
Permittee, including affiliates, if any

Post Office Box 37  
Located at

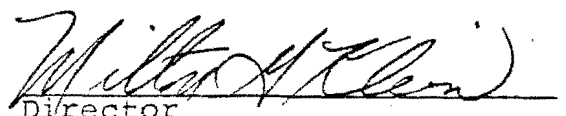
Conda, Idaho 83230

is hereby granted permission to operate the Air  
Pollution Source(s) and Control Equipment specified  
herein provided the emission limitations, monitoring  
requirements and other conditions set forth in the  
Source Permit(s) are complied with.

Validation:

Issued 7/18/79

Expiration 7/17/84

  
Director



PART I

SOURCE PERMIT NO. 13-0420-0003-01

Page 2 of 19

Beker Industries located at Conda, Idaho

is hereby granted permission to operate the following air pollution  
source or control equipment: Beneficiation with a vertical dryer  
with emissions controlled by a cyclone followed by a cyclonic spray  
scrubber.

Restrictions:

| Emission<br>Point | Emission<br>Characteristic | Emission<br>Limitations | Monitoring<br>Requirements                                        |
|-------------------|----------------------------|-------------------------|-------------------------------------------------------------------|
| Scrubber          | Particulate                | See Part III            | Stack Test as<br>Required By<br>Operation and<br>Maintenance Manu |

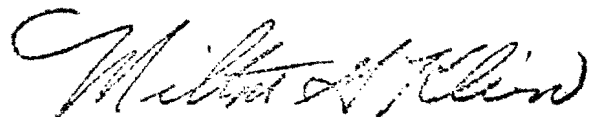
Conditions:

Total process weight is that amount, in pounds per hour, being fed  
to the dryer. Total actual emissions are calculated by adding the  
emissions from the above source(s).

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_



PART I

SOURCE PERMIT NO. 13-0420-0003-02

Page 3 of 19

Beker Industries located at Conda, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment: North Calciner with emissions controlled  
by 3 cyclones followed by a venturi scrubber.

Restrictions:

| Emission<br>Point | Emission<br>Characteristic | Emission<br>Limitations | Monitoring<br>Requirements                                        |
|-------------------|----------------------------|-------------------------|-------------------------------------------------------------------|
| Scrubber          | Particulate                | See Part III            | Stack Test as<br>Required by<br>Operation and<br>Maintenance Manu |

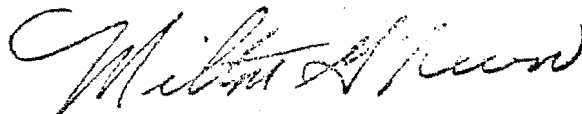
Conditions:

Total process weight is that amount, in pounds per hour, being fed to the calciner. Total actual emissions are calculated by adding the emissions from the above source(s).

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_



PART I

SOURCE PERMIT NO. 13-0420-0003-03

Page 4 of 19

Beker Industries located at Conda, Idaho

is hereby granted permission to operate the following air pollution  
source or control equipment: #3 calciner with emission controlled  
by 3 cyclones followed by a venturi scrubber.

Restrictions:

| Emission<br>Point | Emission<br>Characteristic | Emission<br>Limitations | Monitoring<br>Requirements                                        |
|-------------------|----------------------------|-------------------------|-------------------------------------------------------------------|
| Scrubber          | Particulate                | See Part III            | Stack Test as<br>Required by<br>Operation and<br>Maintenance Manu |

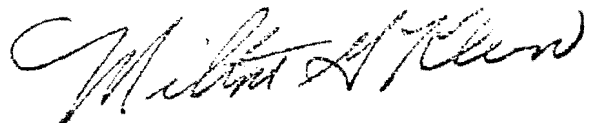
Conditions:

Total process weight is that amount, in pounds per hour, being fed to  
to calciner. Total actual emissions are calculated by adding the  
emissions from the above source(s).

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_



PART I

SOURCE PERMIT NO. 13-0420-0003-04

Page 5 of 19

Beker Industries located at Conda, Idaho

is hereby granted permission to operate the following air pollution source or control equipment: South Calciner with emissions controlled by 3 cyclones followed by a venturi scrubber.

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Restrictions:

| Emission Point | Emission Characteristic | Emission Limitations | Monitoring Requirements                                  |
|----------------|-------------------------|----------------------|----------------------------------------------------------|
| Scrubber       | Particulates            | See Part III         | Stack Test as Required by Operation and Maintenance Manu |

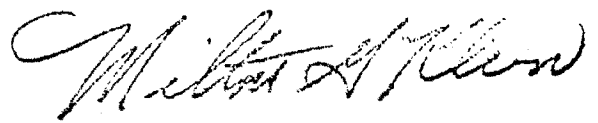
Conditions:

Total process weight is that amount, in pounds per hour, being fed to the calciner. Total actual emissions are calculated by adding the emissions from the above source(s).

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_



PART I

SOURCE PERMIT NO. 13-0420-0003-05

Page 6 of 19

Beker Industries located at Conda, Idaho

is hereby granted permission to operate the following air pollution  
source or control equipment: North storage bin emissions controlled  
by a baghouse.

Restrictions:

| Emission<br>Point | Emission<br>Characteristic | Emission<br>Limitations                                               | Monitoring<br>Requirements                                        |
|-------------------|----------------------------|-----------------------------------------------------------------------|-------------------------------------------------------------------|
| Baghouse          | Particulate                | 0.10 pounds<br>per ton of<br>material fed<br>to the stor-<br>age bin. | Stack Test as<br>Required by<br>Operation and<br>Maintenance Manu |

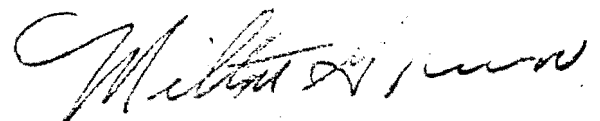
Conditions:

When visible emissions from the baghouse exceed 5% opacity, corrective  
action is to be implemented.

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_



PART I

SOURCE PERMIT NO. 13-0420-0003-06

Page 7 of 19

Beker Industries located at Conda, Idaho

is hereby granted permission to operate the following air pollution  
source or control equipment: North ball mill with emissions controll  
by a baghouse.

Restrictions:

| Emission<br>Point | Emission<br>Characteristic | Emission<br>Limitations                                           | Monitoring<br>Requirements                                        |
|-------------------|----------------------------|-------------------------------------------------------------------|-------------------------------------------------------------------|
| Baghouse          | Particulate                | 0.10 Pounds<br>per ton of<br>material fed<br>to the ball<br>mill. | Stack Test as<br>Required by<br>Operation and<br>Maintenance Manu |

Conditions:

When visible emissions from the baghouse exceed 5% opacity,  
corrective action is to be implemented.

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_

*Milton A. Klein*

PART I

SOURCE PERMIT NO. 13-0420-0003-07

Page 8 of 19

Beker Industries located at Conda, Idaho

is hereby granted permission to operate the following air pollution  
source or control equipment: South storage area emissions occurring  
during storage of ore materials are controlled by a baghouse.

Restrictions:

| Emission<br>Point | Emission<br>Characteristic | Emission<br>Limitations | Monitoring<br>Requirements                                        |
|-------------------|----------------------------|-------------------------|-------------------------------------------------------------------|
| Baghouse          | Particulates               | 0.10 PPT <sup>1</sup>   | Stack Test as<br>Required by<br>Operation and<br>Maintenance Manu |

Conditions:

When visible emissions from the baghouse exceed 5% opacity,  
corrective action is to be implemented.

PPT<sup>1</sup> - Pounds per ton of material processed.

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_

*Milton A. Klein*

## PART I

SOURCE PERMIT NO. 13-0420-0003-08Page 9 of 19Beker Industries located at Conda, Idaho

is hereby granted permission to operate the following air pollution  
source or control equipment: Grinding operation (south ball mill)  
input feed from emission point 07; emissions controlled by two  
baghouses.

## Restrictions:

|    | Emission<br>Point | Emission<br>Characteristic | Emission<br>Limitations | Monitoring<br>Requirements                                       |
|----|-------------------|----------------------------|-------------------------|------------------------------------------------------------------|
| #1 | Baghouse          | Particulate                | 0.10 PPT <sup>1</sup>   | Stack Test as<br>Required by<br>Operation and<br>Maintenance Mar |
| #2 | Baghouse          | Particulate                | 0.10 PPT <sup>1</sup>   |                                                                  |

## Conditions:

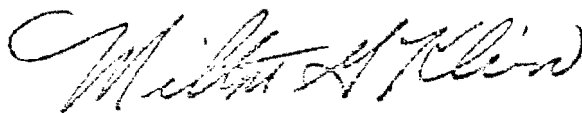
When visible emissions from the baghouse exceed 5% opacity,  
corrective action is to be implemented.

PPT<sup>1</sup> - Pounds per ton of material processed.

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_





PART I

SOURCE PERMIT NO. 13-0420-0003-09

Page 10 of 19

Beker Industries located at Conda, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment: Production of phosphoric acid in-  
cluding digester and filtration systems, with emissions controlled  
by a cyclonic spray scrubber.

Restrictions:

| Emission<br>Point | Emission<br>Characteristic | Emission<br>Limitations | Monitoring<br>Requirements                                       |
|-------------------|----------------------------|-------------------------|------------------------------------------------------------------|
| Scrubber          | Particulate                | See Part III            | Stack Test as<br>Required by<br>Operation and<br>Maintenance Man |

Conditions:

Total process weight is that amount, in pounds per hour, being fed to the digester. Total actual emissions are calculated by adding the emissions from the above source(s).

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_

*Milton A. Klein*

PART I

SOURCE PERMIT NO. 13-0420-0003-10

Page 11 of 19

Beker Industries located at Conda, Idaho

is hereby granted permission to operate the following air pollution  
source or control equipment: Diammonium phosphate production:  
Reactor, granulator and cooler are controlled by an ammonia scrubber  
followed by a cyclonic scrubber. All scrubbers exhaust through a  
common stack.

Restrictions:

| Emission<br>Point | Emission<br>Characteristic | Emission<br>Limitations | Monitoring<br>Requirements                                       |
|-------------------|----------------------------|-------------------------|------------------------------------------------------------------|
| Common Stack      | Particulate                | See Part III            | Stack Test as<br>Required by<br>Operation and<br>Maintenance Man |

Conditions:

Total process weight is that amount, in pounds per hour, being fed to the reactor. Total actual emissions are calculated by adding the emissions from the above source(s).

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_



PART I

SOURCE PERMIT NO. 13-0420-0003-11

Page 12 of 19

Beker Industries located at Conda, Idaho

is hereby granted permission to operate the following air pollution  
source or control equipment: West Sulfuric Acid Plant.

Restrictions:

| Emission Point | Emission Characteristic             | Emission Limitations                                              | Monitoring Requirements                                              |
|----------------|-------------------------------------|-------------------------------------------------------------------|----------------------------------------------------------------------|
| Stack          | SO <sub>2</sub>                     | 27.0 PPT <sup>1</sup> or 1125 pounds of SO <sub>2</sub> per hour. | Continuous - Stack Test as Required by Operation and Maintenance Man |
|                | H <sub>2</sub> SO <sub>4</sub> Mist | 0.50 Pounds per ton of 100% sulfuric acid produced.               | Stack Test as Required by Operation and Maintenance Man              |

Conditions:

PPT<sup>1</sup> - Pounds per ton of 100% equivalent acid produced.

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_

*Milbert A. Klein*

## PART I

SOURCE PERMIT NO. 13-0420-0003-12Page 13 of 19

Beker Industries located at Conda, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment: East sulfuric acid plant.

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## Restrictions:

| Emission Point | Emission Characteristic             | Emission Limitations                                                                   | Monitoring Requirements                                                 |
|----------------|-------------------------------------|----------------------------------------------------------------------------------------|-------------------------------------------------------------------------|
| Stack          | SO <sub>2</sub>                     | 4.0 PPT <sup>1</sup> or not to exceed 504 pounds of SO <sub>2</sub> per 3 hour period. | Continuous - Stack Test as Required by Operation and Maintenance Manual |
|                | H <sub>2</sub> SO <sub>4</sub> Mist | 0.15 Pounds per ton of 100% sulfuric acid produced.                                    | Stack Test as Required by Operation and Maintenance Manual              |

## Conditions:

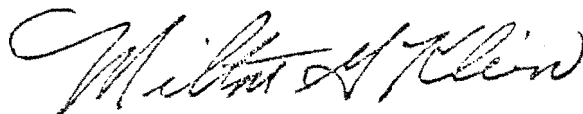
- 1) This source is required to meet new source performance standards.
- 2) Visible emissions are not to exceed 10% opacity.

PPT<sup>1</sup> - Pounds per ton of equivalent 100% acid produced.

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_



PART I

SOURCE PERMIT NO. 13-0420-0003-13

Page 14 of 19

Beker Industries located at Conda, Idaho

is hereby granted permission to operate the following air pollution  
source or control equipment: Ammonia Plant

Restrictions:

| Emission<br>Point | Emission<br>Characteristic | Emission<br>Limitations | Monitoring<br>Requirements |
|-------------------|----------------------------|-------------------------|----------------------------|
|-------------------|----------------------------|-------------------------|----------------------------|

General Provisions of the Rules and Regulations for the Control  
of Air Pollution in Idaho

Conditions:

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_

*Milton L. Klein*

PART I

SOURCE PERMIT NO. 13-0420-0003-14

Page 15 of 19

Beker Industries located at Conda, Idaho

is hereby granted permission to operate the following air pollution  
source or control equipment: Beneficiation building with baghouse.

Restrictions:

| Emission<br>Point | Emission<br>Characteristic | Emission<br>Limitations                             | Monitoring<br>Requirements                                       |
|-------------------|----------------------------|-----------------------------------------------------|------------------------------------------------------------------|
| Baghouse          | Particulate                | 0.10 Pounds<br>per ton of<br>material<br>processed. | Stack Test as<br>Required by<br>Operation and<br>Maintenance Mar |

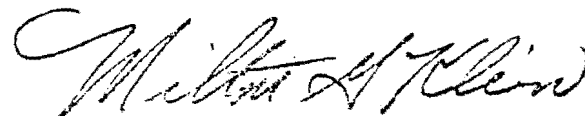
Conditions:

When visible emissions from the baghouse exceed 5% opacity,  
corrective action is to be implemented.

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_

  
Supervising Engineer

## PART II GENERAL PROVISIONS

- A All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or non-compliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules and Regulations 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 and Regulations 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 laws for the control of air pollution.
- C The permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
- 1) To enter upon the permittee's 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 equipment or monitoring method required in this permit, and to sample any emission of pollutants.
- D Except for data determined to be confidential under Section 39-111, Idaho Code, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Division of Environment.
- E 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.
- F In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Director.
- G Until the expiration date, this permit shall be renewable annually, provided the permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit



such information within sixty (60) days after receipt of the Director's request shall cause the permit to be voided.

- H The Director may require the permittee to develop a list of Operation and Maintenance Procedures which must be approved by the Department. Such list of procedures shall become a part of this permit by reference, and the permittee shall adhere to all of the operation and maintenance procedures contained therein.
- I The permittee shall provide the appropriate regional office a minimum of five (5) days notice prior to the scheduled date of any emissions test required pursuant to this permit. The permittee shall notify the appropriate regional office of any change in the testing schedule and shall provide at least one (1) days notice prior to conducting any rescheduled test. Any records or data generated as a result of such compliance tests shall be made available to the Department upon request.

## PART III EMISSION LIMITATIONS

1. Allowable Mass Emission Rate (Effective on Issuance of Permit Unless Otherwise Noted)

A person shall not discharge into the atmosphere from any source operating prior to February 1, 1979 particulate matter in excess of the amount shown by the following equations:

If PW is less than 17,000 pounds per hour,

$$E = .045 (PW)^{0.60}$$

If PW is equal to or greater than 17,000 pounds per hour,

$$E = 1.12 (PW)^{0.27}$$

Where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour.

## STATE OF IDAHO

## DEPARTMENT OF HEALTH AND WELFARE

## DIVISION OF ENVIRONMENT

Pursuant to the Provisions  
of Section 39-115 of the Idaho Code,  
and the Rules and Regulations for the Con-  
trol of Air Pollution in Idaho,

Monsanto Company  
Permittee, including affiliates, if any

Post Office Box 816  
Located at

Soda Springs, Idaho 83276

is hereby granted permission to operate the Air  
Pollution Source(s) and Control Equipment specified  
herein provided the emission limitations, monitoring  
requirements and other conditions set forth in the  
Source Permit(s) are complied with.

Validation:

Issued 7/18/79

Expiration 7/17/84

  
Director

PART I

SOURCE PERMIT NO. 13-0420-0001-01

Page 2 of 15

Monsanto Corporation located at Soda Springs, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment: Natural gas fired boiler with distillat  
fuel oil for standby.

Restrictions:

| Emission<br>Point | Emission<br>Characteristic | Emission<br>Limitations | Monitoring<br>Requirements |
|-------------------|----------------------------|-------------------------|----------------------------|
|-------------------|----------------------------|-------------------------|----------------------------|

Sulfur limitations for distillate fuel grades as defined in  
section 1-1354 of the Rules and Regulations for the Control of  
Air Pollution in Idaho

Conditions:

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_



PART I

SOURCE PERMIT NO. 13-0420-0001-02

Page 3 of 15

Monsanto Corporation located at Soda Springs, Idaho

is hereby granted permission to operate the following air pollution  
source or control equipment: Phosphate ore nodulizing kiln and  
cooler; both points are controlled by separate spray towers.

Restrictions:

| Emission<br>Point              | Emission<br>Characteristic | Emission<br>Limitations | Monitoring<br>Requirements                                         |
|--------------------------------|----------------------------|-------------------------|--------------------------------------------------------------------|
| Nodulizing Kiln<br>Spray Tower | Particulate                | See Part III            | Stack Tests as<br>Required by<br>Operation and<br>Maintenance Manu |
| Cooler Spray<br>Tower          | Particulate                |                         |                                                                    |

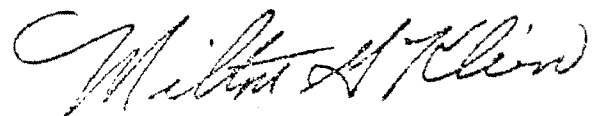
Conditions:

Total process weight is that amount, in pounds per hour, being fed  
to the nodulizing kiln. Total actual emissions are calculated by  
adding the emissions from the above source(s).

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_



PART I

SOURCE PERMIT NO. 13-0420-0001-03

Page 4 of 15

Monsanto Corporation located at Soda Springs, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment: Crushing and screening with emissions  
controlled by a venturi scrubber.

Restrictions:

| Emission<br>Point   | Emission<br>Characteristic | Emission<br>Limitations | Monitoring<br>Requirements                                        |
|---------------------|----------------------------|-------------------------|-------------------------------------------------------------------|
| Venturi<br>Scrubber | Particulate                | See Part III            | Stack Test as<br>Required by<br>Operation and<br>Maintenance Manu |

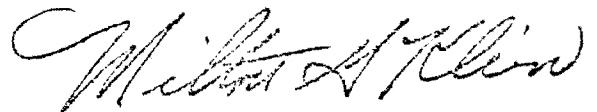
Conditions:

Total process weight is that amount in pounds per hour, being fed  
to the crushing and screening operation. Total actual emissions are  
calculated by adding the emissions from the above source(s).

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_



PART I

SOURCE PERMIT NO. 13-0420-0001-04

Page 5 of 15

Monsanto Corporation located at Soda Springs, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment: Coke and quartzite handling and storage  
with emissions controlled by 4 baghouses

Restrictions:

\*PPT means pounds per ton of material processed in this operation.

| Emission Point              | Emission Characteristic | Emission Limitations | Monitoring Requirements                               |
|-----------------------------|-------------------------|----------------------|-------------------------------------------------------|
| Coke handling Baghouse      | Particulate             | 0.10 PPT*            | Stack test as required by Operatic & Maintenance Manu |
| Quartzite handling Baghouse | Particulate             | 0.10 PPT*            |                                                       |
| Coke Bunker Baghouse        | Particulate             | 0.10 PPT*            |                                                       |
| 105 Conveyor Baghouse       | Particulate             | 0.10 PPT*            |                                                       |

Conditions:

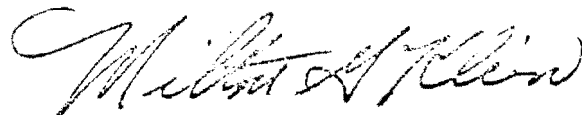
When visible emissions from the baghouse exceed 5% opacity,  
Corrective action is to be implemented.

\*PPT - Pounds per ton of material input.

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_



PART I

SOURCE PERMIT NO. 13-0420-0001-05

Page 6 of 15

Monsanta Corporation located at Soda Springs, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment: Coke dryer and quartz dryer with  
emissions controlled by a scrubber.

Restrictions:

| Emission<br>Point | Emission<br>Characteristic | Emission<br>Limitations | Monitoring<br>Requirements                                         |
|-------------------|----------------------------|-------------------------|--------------------------------------------------------------------|
| Scrubber          | Particulate                | Part III                | Stack Tests as<br>Required by<br>Operation and<br>Maintenance Manu |

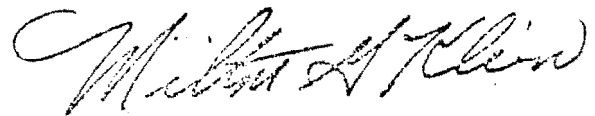
Conditions:

Total process weight is that amount, in pounds per hour, being fed to the dryer. Total actual emissions are calculated by adding the emissions from the above source(s).

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_





PART I

SOURCE PERMIT NO. 13-0420-0001-06

Page 7 of 15

Monsanto Corporation located at Soda Springs, Idaho

is hereby granted permission to operate the following air pollution  
source or control equipment: Proportioning of phosphate ore, coke and  
quartzite and stocking area over furnaces. Scale room transfer points  
are controlled by a scrubber. Stocking area to be controlled in  
accordance with the schedule in Part IV.

Restrictions:

| Emission<br>Point                        | Emission<br>Characteristic | Emission<br>Limitations                             | Monitoring<br>Requirements                                        |
|------------------------------------------|----------------------------|-----------------------------------------------------|-------------------------------------------------------------------|
| Scale Room<br>Transfer Point<br>Scrubber | Particulate                | 0.10 Pounds<br>per ton of<br>material<br>processed. | Stack Test as<br>Required by<br>Operation and<br>Maintenance Menu |

Conditions:

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_



## PART I

SOURCE PERMIT NO. 13-0420-0001-07Page 8 of 15

Monsanto Corporation located at Soda Springs, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment: #7 electric arc furnace with emissions  
from the furnace tapping operations controlled by a venturi scrubber.

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## Restrictions:

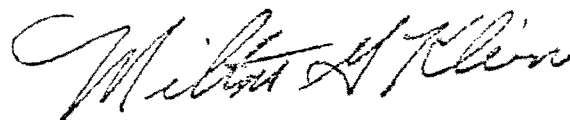
| Emission<br>Point | Emission<br>Characteristic | Emission<br>Limitations                             | Monitoring<br>Requirements                                          |
|-------------------|----------------------------|-----------------------------------------------------|---------------------------------------------------------------------|
| Scrubber          | Particulate                | 0.20 Pounds<br>per ton of<br>material<br>processed. | Stack Test as<br>Required by<br>Operation and<br>Maintenance Manual |

## Conditions:

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_

\_\_\_\_\_  
Authorizing Signature

PART I

SOURCE PERMIT NO. 13-0420-0001-08

Page 9 of 15

Monsanto Corporation located at Soda Springs, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment: #8 electric arc furnace with emissions  
from the furnace tapping operations controlled by a venturi scrubber

Restrictions:

| Emission Point | Emission Characteristic | Emission Limitations                       | Monitoring Requirements                                    |
|----------------|-------------------------|--------------------------------------------|------------------------------------------------------------|
| Scrubber       | Particulate             | 0.20 Pounds per ton of material processed. | Stack Test as Required by Operation and Maintenance Manual |

Conditions:

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_

*Milton A. Klein*

PART I

SOURCE PERMIT NO. 13-0420-0001-9

Page 10 of 15

Monsanto Corporation located at Soda Springs, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment: #9 electric arc furnace with emissions  
from the furnace tapping operations controlled by a venturi scrub

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Restrictions:

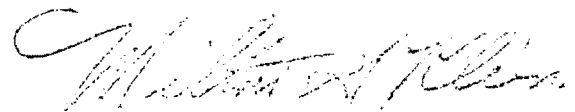
| Emission<br>Point | Emission<br>Characteristic | Emission<br>Limitations                             | Monitoring<br>Requirements                                       |
|-------------------|----------------------------|-----------------------------------------------------|------------------------------------------------------------------|
| Scrubber          | Particulate                | 0.20 Pounds<br>per ton of<br>material<br>processed. | Stack Test as<br>Required by<br>Operation and<br>Maintenance Man |

Conditions:

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_



## PART II GENERAL PROVISIONS

- A. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or non-compliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules and Regulations 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 and Regulations 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 laws for the control of air pollution.
- C. The permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
- 1) To enter upon the permittee's 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 equipment or monitoring method required in this permit, and to sample any emission of pollutants.
- D Except for data determined to be confidential under Section 39-111, Idaho Code, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Division of Environment.
- E 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.
- F In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Director.
- G Until the expiration date, this permit shall be renewable annually, provided the permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit

such information within sixty (60) days after receipt of the Director's request shall cause the permit to be voided.

- H The Director may require the permittee to develop a list of Operation and Maintenance Procedures which must be approved by the Department. Such list of procedures shall become a part of this permit by reference, and the permittee shall adhere to all of the operation and maintenance procedures contained therein.
- I The permittee shall provide the appropriate regional office a minimum of five (5) days notice prior to the scheduled date of any emissions test required pursuant to this permit. The permittee shall notify the appropriate regional office of any change in the testing schedule and shall provide at least one (1) days notice prior to conducting any rescheduled test. Any records or data generated as a result of such compliance tests shall be made available to the Department upon request.

## PART III EMISSION LIMITATIONS

1. Allowable Mass Emission Rate (Effective on Issuance of Permit Unless Otherwise Noted)

A person shall not discharge into the atmosphere from any source operating prior to February 1, 1979 particulate matter in excess of the amount shown by the following equations:

If PW is less than 17,000 pounds per hour,

$$E = .045 (PW)^{0.60}$$

If PW is equal to or greater than 17,000 pounds per hour,

$$E = 1.12 (PW)^{0.27}$$

Where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour.



## PART IV.

| <u>Equipment</u>                                                                                                                                                                                    | <u>Engineering &amp; Development</u> | <u>Begin Construction</u> | <u>Complete Construction</u> | <u>Shakedown Period</u>            | <u>In Compliance</u> |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|---------------------------|------------------------------|------------------------------------|----------------------|
| <u>Nodule Fines From Burden Screens</u><br>Install Dust Controls                                                                                                                                    | Jan. 15, 1978<br>to Jan. 15, 1979    | Feb. 15, 1979             | May 15, 1979                 | May 15, 1979 to<br>June 30, 1979   | June 30, 1979        |
| <u>Precipitator Dust Disposal</u><br>Install such equipment or institute such operational measures as necessary to control emissions from phosphorus burning of precipitator dust at disposal site. | Jan. 31, 1978<br>to Jan. 31, 1981    | Oct. 30, 1980             | Oct. 31, 1981                | Oct. 31, 1981 to<br>Jan. 31, 1982  | Jan. 31, 1982        |
| <u>Stocking System Area Dust Control</u><br>Install Dust Controls                                                                                                                                   | Dec. 31, 1978 to<br>July 31, 1980    | March 31, 1980            | March 31, 1981               | March 31, 1981 to<br>June 30, 1981 | June 30, 1981        |
| <u>Vent Risers</u><br>Install sprays in vent stacks to scrub emissions during emergency periods when furnaces must be vented.                                                                       | Jan. 1, 1978 to<br>Jan 1, 1979       | Jan. 25, 1978             | May 31, 1979                 | Feb. 1, 1978 to<br>June 30, 1979   | June 30, 1979        |
| <u>Slag Handling</u><br>Alter slagging process to reduce fugitive emissions.                                                                                                                        |                                      |                           |                              |                                    |                      |

K.4

Page 1 of 12

STATE OF IDAHO

DEPARTMENT OF HEALTH AND WELFARE

DIVISION OF ENVIRONMENT

Pursuant to the Provisions  
of Section 39-115 of the Idaho Code,  
and the Rules and Regulations for the Con-  
trol of Air Pollution in Idaho,

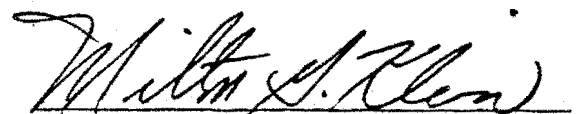
Kerr McGee  
Permittee, including affiliates, if any

Soda Springs, Idaho 83276  
Located at

is hereby granted permission to operate the Air  
Pollution Source(s) and Control Equipment specified  
herein provided the emission limitations, monitoring  
requirements and other conditions set forth in the  
Source Permit(s) are complied with.

Validation:

Issued 7/18/79Expiration 7/17/84

  
Director

PART I

SOURCE PERMIT NO. 13-0420-0002-01

Page 2 of 12

Kerr McGee located at Soda Springs, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment: Ferrophos crusher, dryer, impactor, and  
coarse storage area; all points are controlled by one baghouse

Restrictions:

| Emission<br>Point | Emission<br>Characteristic | Emission<br>Limitations                                               | Monitoring<br>Requirements                                             |
|-------------------|----------------------------|-----------------------------------------------------------------------|------------------------------------------------------------------------|
| Baghouse          | Particulate                | 0.10 Pounds<br>per ton of<br>raw material<br>input to the<br>process. | Stack test as<br>required by<br>Operation and<br>Maintenance<br>Manual |

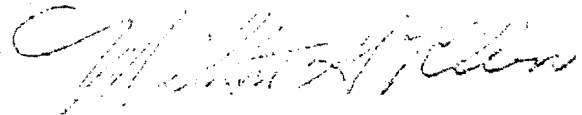
Conditions:

When visible emissions from the baghouse exceed 5% opacity corrective  
action is to be implemented.

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_



PART I

SOURCE PERMIT NO. 13-0420-0002-02

Page 3 of 12

Kerr McGee located at Soda Springs, Idaho

is hereby granted permission to operate the following air pollution  
source or control equipment: Ferrophos Ballmill with Baghouse

Restrictions:

| Emission<br>Point | Emission<br>Characteristic | Emission<br>Limitations                                               | Monitoring<br>Requirements                                        |
|-------------------|----------------------------|-----------------------------------------------------------------------|-------------------------------------------------------------------|
| Baghouse          | Particulate                | 0.10 Pounds<br>per ton of<br>raw material<br>input to the<br>process. | Stack Test as<br>required by<br>Operation and<br>Maintenance Manu |

Conditions:

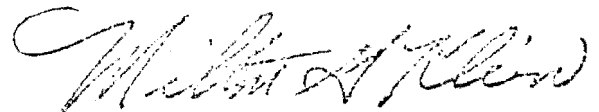
When visible emissions from the baghouse exceed 5% opacity corrective  
action is to be implemented.

PPT<sup>1</sup> - Pounds per ton of raw material input

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_



\_\_\_\_\_  
Authorizing Signature

PART I

SOURCE PERMIT NO. 13-0420-0002-03

Page 4 of 12

Kerr McGee located at Soda Springs, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment: Limestone Ballmill with the emissions  
controlled by a scrubber

Restrictions:

| Emission<br>Point | Emission<br>Characteristic | Emission<br>Limitations | Monitoring<br>Requirements                                          |
|-------------------|----------------------------|-------------------------|---------------------------------------------------------------------|
| Scrubber          | Particulate                | See Part III            | Stack Test as<br>required by<br>Operation and<br>Maintenance Manual |

Conditions:

Total process weight is that amount, in pounds per hour, being fed to the ballmill. Total actual emissions are calculated by adding the emissions from the above source(s).

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_

*Milton A. Klein*

PART I

SOURCE PERMIT NO. 13-0420-0002-04

Page 5 of 12

Kerr McGee located at Soda Springs, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment: Metering of salt/soda ash, limestone  
and ferrophos; #1 roaster, with quench and leach tanks. Emissions  
from the roaster are controlled by a cyclone followed by a venturi  
scrubber.

Restrictions:

| Emission<br>Point | Emission<br>Characteristic | Emission<br>Limitations | Monitoring<br>Requirements                                        |
|-------------------|----------------------------|-------------------------|-------------------------------------------------------------------|
| Scrubber          | Particulate                | See Part III            | Stack test as<br>required by<br>Operation and<br>Maintenance Manu |

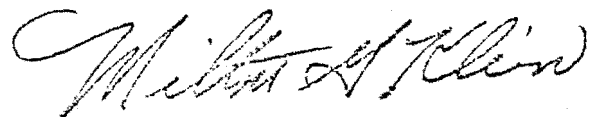
Conditions:

Total process weight is that amount, in pounds per hour, being fed  
to the roaster. Total actual emissions are calculated by adding  
the emissions from the above source(s).

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_



PART I

SOURCE PERMIT NO. 13-0420-0002-05

Page 6 of 12

Kerr McGee located at Soda Springs, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment: Metering of salt/soda ash, limestone  
and ferrophos; #2 roaster, with quench and leach tanks. Emissions  
from the roaster are controlled by a cyclone followed by a venturi  
scrubber.

Restrictions:

| Emission<br>Point | Emission<br>Characteristic | Emission<br>Limitations | Monitoring<br>Requirements                                          |
|-------------------|----------------------------|-------------------------|---------------------------------------------------------------------|
| Scrubber          | Particulate                | See Part III            | Stack test as<br>required by<br>Operation and<br>Maintenance Manual |

Conditions:

Total process weight is that amount, in pounds per hour, being fed to the roaster. Total actual emissions are calculated by adding the emissions from the above source(s).

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_

*Milton A. Klein*

PART I

SOURCE PERMIT NO. 13-0420-0002-06

Page 7 of 12

Kerr McGee located at Soda Springs, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment: Wet processes for purification of  
vanadium

Restrictions:

| Emission<br>Point | Emission<br>Characteristic | Emission<br>Limitations | Monitoring<br>Requirements |
|-------------------|----------------------------|-------------------------|----------------------------|
|-------------------|----------------------------|-------------------------|----------------------------|

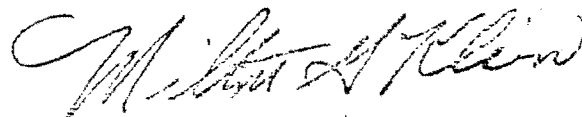
General provisions of the Rules and Regulations for the Control  
of Air Pollution in Idaho.

Conditions:

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_





PART I

SOURCE PERMIT NO. 13-0420-0002-07

Page 8 of 12

Kerr McGee located at Soda Springs, Idaho  
is hereby granted permission to operate the following air pollution  
source or control equipment: Ammonium meta vanadate dryer, decomposer  
fusing operation and packaging; the decomposer emissions are con-  
trolled by a baghouse.

Restrictions:

| Emission Point | Emission Characteristic | Emission Limitations                            | Monitoring Requirements                                    |
|----------------|-------------------------|-------------------------------------------------|------------------------------------------------------------|
| Baghouse       | Particulate             | See Part III                                    | Stack test as required by Operation and Maintenance Manual |
| Dryer          | NH <sup>3</sup>         | General provisions of the Rules and Regulations |                                                            |

Conditions:

When visible emissions from the baghouse exceed 5% opacity corrective action is to be implemented.

Validation (if different from Facility Permit)

Issued \_\_\_\_\_

Expiration \_\_\_\_\_

*Milton A. Klein*

## PART II GENERAL PROVISIONS

- A All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or non-compliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules and Regulations 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 and Regulations 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 laws for the control of air pollution.
- C The permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
- 1) To enter upon the permittee's 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 equipment or monitoring method required in this permit, and to sample any emission of pollutants.
- D Except for data determined to be confidential under Section 39-111, Idaho Code, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Division of Environment.
- E 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.
- F In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Director.
- G Until the expiration date, this permit shall be renewable annually, provided the permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit

such information within sixty (60) days after receipt of the Director's request shall cause the permit to be voided.

- H The Director may require the permittee to develop a list of Operation and Maintenance Procedures which must be approved by the Department. Such list of procedures shall become a part of this permit by reference, and the permittee shall adhere to all of the operation and maintenance procedures contained therein.
- I The permittee shall provide the appropriate regional office a minimum of five (5) days notice prior to the scheduled date of any emissions test required pursuant to this permit. The permittee shall notify the appropriate regional office of any change in the testing schedule and shall provide at least one (1) days notice prior to conducting any rescheduled test. Any records or data generated as a result of such compliance tests shall be made available to the Department upon request.

## PART III EMISSION LIMITATIONS

1. Allowable Mass Emission Rate (Effective on Issuance of Permit Unless Otherwise Noted)

A person shall not discharge into the atmosphere from any source operating prior to February 1, 1979 particulate matter in excess of the amount shown by the following equations:

If PW is less than 17,000 pounds per hour,

$$E = .045 (PW)^{0.60}$$

If PW is equal to or greater than 17,000 pounds per hour,

$$E = 1.12 (PW)^{0.27}$$

Where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour.



**AIR QUALITY  
TIER I OPERATING PERMIT**

**State of Idaho  
Department of Environmental Quality**

**PERMIT NO.:** T1-9507-114-1  
**FACILITY ID NO.:** 077-00006  
**AQCR:** 061 **CLASS:** A  
**SIC:** 2874 **ZONE:** 12  
**UTM COORDINATE (km):** 375.6, 4751.6

**1. PERMITTEE**  
J.R. Simplot Co. - Don Siding Plant

**2. PROJECT**  
Tier I Operating Permit

**3. MAILING ADDRESS**  
P.O. Box 912

**CITY**  
Pocatello

**STATE ID** **ZIP**  
83204

**4. FACILITY CONTACT**  
Leon C. Pruett

**TITLE**  
Environmental, Safety, and Health Manager

**TELEPHONE**  
(208) 234-5370

**5. RESPONSIBLE OFFICIAL**  
Delbert Butler

**TITLE**  
Plant Manager

**TELEPHONE**  
(208) 234-5410

**6. EXACT PLANT LOCATION**  
Section 18 R-34-E, T-6-S; 5½ Section 7 R-34-E T-6-S

**COUNTY**  
Power

**7. GENERAL NATURE OF BUSINESS and KINDS OF PRODUCTS**  
Manufacture of nitrogen, phosphate, and sulfate commercial products

**8. PERMIT AUTHORITY**

This Tier I operating permit is issued pursuant to Idaho Code §39-115 and the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.300 - 386. The permittee shall comply with the terms and conditions of this permit.

This permit incorporates all applicable terms and conditions of prior air quality permits issued by the Department of Environmental Quality (DEQ) for the permitted source, unless the permittee emits toxic pollutants subject to state-only requirements pursuant to IDAPA 58.01.01.210, and the permittee elects not to incorporate those terms and conditions into this operating permit.

The effective date of this permit is the date of signature by DEQ on the cover page

**C. STEPHEN ALLRED, DIRECTOR**  
**DEPARTMENT OF ENVIRONMENTAL QUALITY**

**DATE ISSUED:** April 5, 2004

**DATE EXPIRES:** ~~XXXXXXXXXX~~

**AIR QUALITY TIER I OPERATING PERMIT NUMBER: T1-9507-114-1**

**Permittee:** J.R. Simplot Co. - Don Siding Plant  
**Location:** Pocatello, Idaho

**Project No.**  
T1-9507-114-1

**Date Issued:** April 5, 2004

**Date Expires:** ~~██████████~~

*The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.*

**Permit Limits / Standard Summary**

5.1 The PM and PM<sub>10</sub> emissions shall not exceed 1.33 lb/hr and 5.83 T/yr.  
[PTC No. 077-00006, 9/20/00]

5.2 The SO<sub>2</sub> emissions shall not exceed 0.11 lb/hr and 0.46 T/yr.  
[PTC No. 077-00006, 9/20/00]

5.3 The NO<sub>x</sub> emissions shall not exceed 7.00 lb/hr and 30.7 T/yr.  
[PTC No. 077-00006, 9/20/00]

5.4 The NO<sub>x</sub> emissions shall not exceed 0.04 lb/MMBtu.  
[40 CFR 60.44b(a)(1); PTC No. 077-00006, 9/20/00]

5.5 The VOC emissions shall not exceed 0.96 lb/hr and 4.22 T/yr.  
[PTC No. 077-00006, 9/20/00]

5.6 The CO emissions shall not exceed 14.0 lb/hr and 61.3 T/yr.  
[PTC No. 077-00006, 9/20/00]

5.7 The PM from the boiler stack shall not exceed a concentration of 0.015 grains per dry standard cubic foot corrected to 3% oxygen.  
[IDAPA 58.01.01.676, 05/01/94; PTC No. 077-00006, 9/20/00]

5.8 For purposes of compliance with Permit Condition 5.9, the NO<sub>x</sub> standards in Permit Condition 5.4 apply at all times including periods of startup, shutdown, or malfunction.  
[40 CFR 60.44b(h)]

5.9 Compliance with the NO<sub>x</sub> emissions limit in Permit Condition 5.4 is determined on a 30-day rolling average basis.  
[40 CFR 60.44b(i); PTC No. 077-00006, 9/20/00]

**Operating Requirement**

5.10 The maximum hourly natural gas throughput of the boiler shall not exceed 0.175 MMcf/hr. The maximum annual natural gas throughput of the boiler shall not exceed 1,533 MMcf/yr.  
[PTC No. 077-00006, 9/20/00]

5.11 The boiler shall only use natural gas as fuel.  
[PTC No. 077-00006, 9/20/00]

**Monitoring and Record-keeping Requirements**

5.12 An O&M manual for the boiler and LoNO<sub>x</sub> - EGR systems shall remain on site at all times.  
[PTC No. 077-00006, 9/20/00]

**AIR QUALITY TIER I OPERATING PERMIT NUMBER: T1-9507-114-1**

**Permittee:** J.R. Simplot Co. - Don Siding Plant

**Project No.**

**Date Issued:** April 5, 2004

**Location:** Pocatello, Idaho

T1-9507-114-1

**Date Expires:** ~~██████████~~

*The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.*

5.13 The permittee shall install, calibrate, and operate a NO<sub>x</sub> CEMS for measuring emissions discharged to the atmosphere and record the output of the system.  
[PTC No. 077-00006, 9/20/00; 40 CFR 60.48b(b)]

5.14 The NO<sub>x</sub> CEMS shall be operated and data recorded during all periods of operation of the affected facility except for continuous monitoring system breakdowns and repairs. Data is recorded during calibration checks and zero and span adjustments.  
[PTC No. 077-00006, 9/20/00; 40 CFR 60.48b(c)]

5.15 The one-hour average NO<sub>x</sub> emission rates measured by the NO<sub>x</sub> CEMS shall be expressed in lb/MMBtu heat input and shall be used to calculate the average 30-day emissions rates under Permit Condition 5.4. The one-hour averages shall be calculated using the data points required under 40 CFR 60.13(b). At least two data points must be used to calculate each one-hour average.  
[PTC No. 077-00006, 9/20/00; 40 CFR 60.13(b), 48b(d)]

5.16 The NO<sub>x</sub> CEMS must meet all requirements set forth in 40 CFR 60.13 (provided in Appendix B).  
[PTC No. 077-00006, 9/20/00; 40 CFR 60.13(b), 48b(e)]

5.17 The span value for NO<sub>x</sub> CEMS is 500 ppm.  
[PTC No. 077-00006, 9/20/00; 40 CFR 60.13(b), 48b(e)(2)]

5.18 When NO<sub>x</sub> emissions data is not obtained because of CEMS breakdowns, repairs, calibration checks, and zero and span adjustments, emissions data will be obtained by using standby monitoring systems, EPA Method 7, EPA Method 7A, or other approved reference methods to provide emissions data for a minimum of 75% of the operating hours in each steam-generating unit operating day for at least 22 out of 30 successive steam-generating unit operating days.  
[PTC No. 077-00006, 9/20/00; 40 CFR 60.13(b), 48b(f)]

~~5.19 Each operating day, the permittee shall monitor and record the natural gas usage for that day, in MMcf/day. Once per month, the permittee shall record the total natural gas usage for the previous rolling 12-month period, in MMcf/yr.  
[PTC No. 077-00006, 9/20/00]~~

~~5.20 The permittee shall calculate the emissions of SO<sub>2</sub>, CO, and NO<sub>x</sub> from the boiler on a monthly basis using AP-42 Section 1.4 (3/98) emission factors, or a DEQ-approved alternative.  
[IDAPA 58.01.01.322.06, 07, 5/1/94]~~

5.21 The permittee shall calculate the annual capacity factor for each calendar quarter, and determine the annual capacity factor based on a 12-month rolling average basis with a new annual capacity factor calculated at the end of each calendar month.  
[PTC No. 077-00006, 9/20/00; 40 CFR 60.49b(d)]

~~5.22 The permittee shall maintain the following records for each boiler operating day:~~

~~5.22.1 Calendar date~~

~~5.22.2 The average hourly NO<sub>x</sub> emission rates (expressed as NO<sub>2</sub>) measured as lb/MMBtu heat input.~~



**AIR QUALITY TIER I OPERATING PERMIT NUMBER: T1-9507-114-1**

**Permittee:** J.R. Simplot Co. - Don Siding Plant

**Project No.**

**Date Issued:** April 5, 2004

**Location:** Pocatello, Idaho

T1-9507-114-1

**Date Expires:** ~~December 31, 2008~~

*The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.*

6.4 The NO<sub>x</sub> emissions from the boiler exhaust stack shall not exceed 2.88 lb/hr and 12.63 T/yr.  
[PTC No. 077-00006, 06/16/95]

6.5 The CO emissions from the boiler exhaust stack shall not exceed 11.7 lb/hr and 51.1 T/yr.  
[PTC No. 077-00006, 06/16/95]

6.6 The VOC emissions from the boiler exhaust stack shall not exceed 0.19 lb/hr, and 0.84 T/yr.  
[PTC No. 077-00006, 06/16/95]

6.7 Particulate emissions from the boiler stack shall not exceed a concentration of 0.015 grains per dry standard cubic foot corrected to 3% oxygen.  
[IDAPA 58.01.01.676, 05/01/94]

**Operating Requirement**

6.8 The Babcock and Wilcox boiler shall only use natural gas as fuel.  
[PTC No. 077-00006, 06/16/95]

6.9 The Babcock and Wilcox boiler shall not burn more than 559,000,000 cf of natural gas per year.  
[PTC No. 077-00006, 06/16/95]

**Monitoring and Record-keeping Requirements**

6.10 The permittee shall record and maintain records of the amounts of natural gas combusted during each day.  
[PTC No. 077-00006, 06/16/95; 40 CFR 60.48c(g); 40 CFR 60.48c(l); IDAPA 58.01.01.322.06, 07, 5/1/94]

6.11 The permittee shall record the cumulative volume of natural gas fuel consumed by the Babcock and Wilcox boiler on a monthly basis. The permittee shall record the total natural gas usage in MMcf per rolling 12-month period. The records shall be kept on site for at least five years and shall be made available to DEQ representatives upon request.  
[IDAPA 58.01.01.322.06, 07, 5/1/94]

6.12 The permittee shall calculate the emissions of SO<sub>2</sub>, CO, and NO<sub>x</sub> from the boiler on a monthly basis using AP-42 Section 1.4 (3/98) emission factors, or a DEQ-approved alternative.  
[IDAPA 58.01.01.322.06, 07, 5/1/94]

**Reporting**

6.13 The permittee shall comply with 40 CFR 60.7, as contained in Appendix B, for notification and record-keeping requirements.  
[40 CFR 60.7]

**AIR QUALITY TIER I OPERATING PERMIT NUMBER: T1-9507-114-1**

**Permittee:** J.R. Simplot Co. - Don Siding Plant

**Project No.**

**Date Issued:** April 5, 2004

**Location:** Pocatello, Idaho

T1-9507-114-1

**Date Expires:** ~~12/12/01~~

*The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.*

**Permit Limits / Standard Summary**

**9.1 Particulate Matter Emissions**

9.1.1 The PM emissions from the Granulation No. 3 stack shall not exceed 7.0 lb/hr and 30.7 T/yr. The ton-per-year emissions limit shall be determined by multiplying the actual or allowable (if actual is not available) pound-per-hour emission rate by the actual hours per year the process(es) venting to this stack operate(s).

[PTC No. 077-00006, 12/12/01]

9.1.2 No person shall emit PM to the atmosphere from any process or process equipment commencing operation on or after October 1, 1979, in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in lb/hr, and PW is the process weight in lb/hr:

a. If PW is less than 9,250 lb/hr,

$$E = 0.045(PW)^{0.60}$$

b. If PW is equal to or greater than 9,250 lb/hr,

$$E = 1.10(PW)^{0.25}$$

[IDAPA 58.01.01.701, 4/5/00]

**9.2 PM<sub>10</sub> Emissions**

9.2.1 The PM<sub>10</sub> emissions from the Granulation No. 3 stack shall not exceed 5.7 lb/hr and 25.0 T/yr. The ton-per-year emissions limit shall be determined by multiplying the actual or allowable (if actual is not available) pound-per-hour emission rate by the actual hours per year the process(es) venting to this stack operate(s).

[PTC No. 077-00006, 12/12/01]

9.2.2 The PM<sub>10</sub> emissions from the diatomaceous earth baghouse shall not exceed 0.28 lb/hr and 1.2 T/yr.

[PTC No. 077-00006, 11/12/99]

9.3 Total fluoride emissions from the Granulation No. 3 stack shall not exceed 1.28 lb/hr, and shall not exceed 5.63 T/yr. The ton-per-year emissions limit shall be determined by multiplying the actual or allowable (if actual is not available) pound-per-hour emission rate by the actual hours per year the process(es) venting to this stack operate(s).

[PTC No. 077-00006, 12/12/01]

9.4 The NO<sub>x</sub> emissions from the Granulation No. 3 stack shall not exceed 3.4 lb/hr and 14.9 T/yr.

[PTC No. 077-00006, 12/12/01]

9.5 The SO<sub>2</sub> emissions from the Granulation No. 3 stack shall not exceed 0.02 lb/hr and 0.90 T/yr.

[PTC No. 077-00006, 12/12/01]

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**Permittee:** J.R. Simplot Co. - Don Siding Plant

**Project No.**

**Date Issued:** April 5, 2004

**Location:** Pocatello, Idaho

T1-9507-114-1

**Date Expires:** [REDACTED]

*The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.*

- 9.14 The dryer, with a maximum rated heat input capacity of 35 MMBtu/hr (determined on a 24-hour rolling average), shall burn only natural gas as fuel.

[PTC No. 077-00006, 12/12/01]

- 9.15 Maintenance to the scrubbers, and/or process equipment, and/or baghouse shall be performed if visible emissions from the Granulation No. 3 plant stack exceed 15% opacity.

[PTC No. 077-00006, 12/12/01]

- 9.16 The permittee shall comply with the Air Pollution Emergency Rules in IDAPA 58.01.01.550 through 562.

[PTC No. 077-00006, 12/12/01]

**Monitoring and Record-keeping Requirements**

- 9.17 The permittee shall conduct compliance tests within 12 months of, or 12 months prior to, December 24, 2002 to demonstrate compliance with the PM hourly emissions limit in Permit Condition 9.1.1, the PM<sub>10</sub> hourly emissions limit in Permit Condition 9.2.1, and the fluoride hourly emissions limit in Permit Condition 9.3.

During calendar years 2003, 2004, and 2005, compliance with the PM<sub>10</sub> emissions limit in Permit Condition 9.2.1 shall be determined by conducting a Method 5 performance test on the granulation No. 3 stack. The PM<sub>10</sub> fraction of the PM emission rate determined during the test shall be determined by multiplying the PM emission rate by a 0.82 conversion factor.

During calendar years 2004 and 2005, Method 5 and 202 performance tests shall be conducted on the granulation No. 3 stack in addition to the Method 5 test. No later than September 30, 2005, Simplot shall submit a permit application to revise the PM<sub>10</sub> emissions limits to reflect the results of the Method 5 and 202 performance tests. The permit application shall contain justification for each emission limit proposed. Once DEQ issues a permit with revised PM<sub>10</sub> emissions limits, compliance with Permit Condition 9.2.1 shall be determined by source testing using Methods 5 and 202 on the granulation No. 3 scrubber stack. The compliance tests shall be performed in accordance with Permit Conditions 2.15, 2.16, 2.17, and the following requirements, except that Permit Condition 9.17.6 shall not apply to testing of emissions of PM and PM<sub>10</sub> until calendar year 2006:

- 9.17.1 Visible emissions shall be observed during each compliance test run using the methods specified in IDAPA 58.01.01.625.

- 9.17.2 The pressure drop across the baghouse shall be monitored and recorded during each compliance test.

- 9.17.3 The pressure drop and liquid flow rate of the wet scrubber shall be monitored and recorded during each compliance test.

- 9.17.4 The feed rate, in tons of P<sub>2</sub>O<sub>5</sub> equivalent per hour, to the Granulation No. 3 plant shall be recorded during each compliance test. The permittee shall determine the rate of equivalent P<sub>2</sub>O<sub>5</sub> feed by first determining the mass rate in tons per hour of phosphorus-bearing feed, then multiplying the phosphorus bearing feed rate by the decimal fraction of P<sub>2</sub>O<sub>5</sub> content.

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**Location:** Pocatello, Idaho

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**Date Expires:** ~~██████████~~

*The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.*

- 9.17.5 The process data specified in the approved test protocol shall be monitored and recorded during the test period.
- 9.17.6 If the measurement during the initial compliance test is less than or equal to 75% of the respective hourly emission standard, no further testing for that emissions standard shall be required during the term of the permit. If the measurement during the initial compliance test is greater than 75%, but less than or equal to 90% of the hourly respective emission standard, a second test for that emissions standard shall be required in the third year of the permit term. If measurement during the compliance test is greater than 90% of the respective hourly emission standard, the permittee shall conduct a compliance test for that emissions standard annually.  
[PTC No. 077-00006, 12/12/01; Tier II Permit No. 077-00006, 12/3/99; IDAPA 58.01.01.322.06, 5/1/94]
- 9.18 To demonstrate compliance with the NO<sub>x</sub>, CO, SO<sub>2</sub>, and VOC emissions limits, the permittee shall continuously monitor the amount of natural gas fired in the dryer. On a monthly basis, the permittee shall record the natural gas consumption of the dryer, the operating hours of the dryer, and the rolling 12-month natural gas usage. The permittee shall calculate the monthly and rolling 12-month emission rate using AP-42 Section 1.4 (3/98) emission factors for natural gas combustion, or a DEQ-approved alternative, on a monthly basis.  
[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.01, 3/19/99]
- 9.19 Compliance with the fugitive PM, PM<sub>10</sub>, and fluoride emission shall be determined by the following:
- 9.19.1 Multiplying the hourly production rate, in tons per hour, by the emission factors of 0.027 lb/T for PM, 0.004 lb/T for PM<sub>10</sub>, and 0.00022 lb/T for fluoride per the facility's Granulation No. 3 upgrade permit application analysis.
- 9.19.2 Multiplying the annual production rate, in tons per year, by the emission factors of 0.027 lb/T for PM, 0.004 lb/T for PM<sub>10</sub>, and 0.00022 lb/T for fluoride per the facility's Granulation No. 3 upgrade permit application analysis.  
[PTC No. 077-00006, 12/12/01]
- 9.20 Within 60 days after startup, the permittee shall develop an O&M manual for the baghouse and wet scrubber system that describes the procedures that will be followed to comply with General Provision 2 of PTC No. 077-00006 and Permit Conditions 9.12 and 9.13. This manual shall remain on site at all times and shall be made available to DEQ representatives upon request.  
[PTC No. 077-00006, 12/12/01]
- 9.21 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.  
[General Provision 2 of PTC No. 077-00006, 12/12/01]
- 9.22 The permittee shall monitor and record the following information:

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T1-9507-114-1

**Date Expires:** ~~December 31, 2008~~

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Table 12.2 contains only a summary of the requirements that apply to the phosphoric acid plant No. 400. Specific permit requirements are listed below Table 12.2.

**Table 12.2<sup>(1)</sup>: SUMMARY OF EMISSIONS LIMITS**

| Permit Conditions | Parameter                 | Permit Limit / Standard Summary                             | Applicable Requirements                        | Operating, Monitoring and Record-Keeping Requirements |
|-------------------|---------------------------|-------------------------------------------------------------|------------------------------------------------|-------------------------------------------------------|
| 12.1              | Total fluoride            | 1.3 lb/hr, 4.71 T/yr                                        | Tier II Permit No. 077-00006                   | 12.6 through 12.12, 12.15 through 12.20               |
|                   |                           | 0.020 lb/T of equivalent P <sub>2</sub> O <sub>5</sub> feed | 40 CFR 63.602(a); Tier II Permit No. 077-00006 |                                                       |
| 12.2              | PM                        | 3.38 lb/hr, 14.80 T/yr                                      | Tier II Permit No. 077-00006                   | 12.6, 12.7, 12.13                                     |
|                   |                           | Process weight rate                                         | IDAPA 58.01.01.701                             |                                                       |
| 12.3              | PM <sub>10</sub>          | 2.77 lb/hr, 12.13 T/yr                                      | Tier II Permit No. 077-00006                   | 12.6, 12.7, 12.13                                     |
| 12.4              | Total reduced sulfur      | 8.61 lb/hr, 37.7 T/yr                                       | Tier II Permit No. 077-00006                   | 12.4, 12.14                                           |
| 12.5              | Fugitive PM <sub>10</sub> | 0.01 lb/hr, 0.03 T/yr                                       | Tier II Permit No. 077-00006                   | 12.5                                                  |

<sup>1</sup>If any requirement in this permit conflicts with any requirement contained in 40 CFR 63, the requirement in 40 CFR 63 shall supercede.

**Permit Limits / Standard Summary****12.1 Total Fluorides**

12.1.1 For the wet process phosphoric acid process line, the permittee shall comply with the total fluorides standard of 0.020 lb/T of equivalent P<sub>2</sub>O<sub>5</sub> feed.

[40 CFR 63.602(a)]

12.1.2 Total particulate and gaseous fluoride emissions from the phosphoric acid plant No. 400 stack shall not exceed 1.30 lb/hr, and 4.71 T/yr.

[Tier II Permit No. 077-00006, 12/3/99]

12.2 The PM emissions from the phosphoric acid plant No. 400 stack shall not exceed the emission limits set by IDAPA 58.01.01.701, or 3.38 lb/hr (whichever is more restrictive), and shall not exceed 14.80 T/yr. The ton-per-year rate shall be determined by multiplying the actual or allowable (if actual is not available) pound-per-hour emission rate by the actual hours per year the process(es) venting to this stack operate(s).

[Tier II Permit No. 077-00006, 12/3/99; IDAPA 58.01.01.701, 4/5/00]

12.3 The PM<sub>10</sub> emissions from the phosphoric acid plant No. 400 stack shall not exceed 2.77 lb/hr and 12.13 T/yr. The ton-per-year rate shall be determined by multiplying the actual or allowable (if actual is not available) pound-per-hour emission rate by the actual hours per year the process(es) venting to this stack operate(s).

[Tier II Permit No. 077-00006, 12/3/99]

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**Date Expires:** ~~December 31, 2005~~

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(F) Section XI, Methods of Analysis For Phosphoric Acid, Superphosphate, Triple Superphosphate, and Ammonium Phosphates, No. 3 Total Phosphorus-  $P_2O_5$ , Method B- Gravimetric Quimociac Method.

(G) Section XI, Methods of Analysis For Phosphoric Acid, Superphosphate, Triple Superphosphate, and Ammonium Phosphates, No. 3 Total Phosphorus-  $P_2O_5$ , Method C- Spectrophotometric Method.

- (4) To comply with Permit Condition 12.11(1) or (2), the owner or operator shall use the monitoring systems in Permit Condition 2.10 to determine the average pressure loss of the gas stream across each scrubber in the process scrubbing system and to determine the average flow rate of the scrubber liquid to each scrubber in the process scrubbing system during each of the total fluoride runs. The arithmetic averages of the three runs shall be used as the baseline average values for the purposes of Permit Condition 12.11(1) or (2).

[40 CFR 63.606(c)]

**12.13 PM and PM<sub>10</sub> Performance Test**

- 12.13.1 The permittee shall conduct compliance tests within 12 months of, or 12 months prior to, December 24, 2002 to demonstrate compliance with the PM and PM<sub>10</sub> hourly emissions limits required in Permit Conditions 12.2 and 12.3. After the first compliance test, the permittee shall conduct a compliance test once per annum to demonstrate compliance with hourly PM and PM<sub>10</sub> emissions limits in Permit Conditions 12.2 and 12.3.

During calendar years 2003, 2004, and 2005, compliance with the PM<sub>10</sub> emissions limit in Permit Condition 12.3 shall be determined by conducting a Method 5 performance test on the belt filter scrubber stack. The PM<sub>10</sub> fraction of the PM emission rate determined during the test shall be determined by multiplying the PM emission rate by a 0.82 conversion factor.

During calendar years 2004 and 2005, Method 5 and 202 performance tests shall be conducted on the belt filter scrubber stack in addition to the Method 5 test. All performance testing shall be conducted in accordance with Permit Condition 2.16.

No later than September 30, 2005, Simplot shall submit a permit application to revise the PM<sub>10</sub> emissions limits to reflect the results of the Method 5 and 202 performance tests. The permit application shall contain justification for each emission limit proposed. Once DEQ issues a permit with revised PM<sub>10</sub> emissions limits, compliance with Permit Condition 12.3 shall be determined by source testing using Methods 5 and 202 on the belt filter scrubber stack.

- 12.13.2 The permittee shall record the equivalent  $P_2O_5$  feed rate to the process, the pressure drop across each scrubber, and the flow rate of the scrubber liquid to each scrubber during compliance tests.

- 12.13.3 The permittee shall conduct a visible emissions evaluation during each compliance test. The evaluation shall be conducted in accordance with the procedures contained in IDAPA 58.01.01.625.

[IDAPA 58.01.01.322.06, 5/1/94; Tier II Permit No. 077-00006, 12/3/99]

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*The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.*

**Permit Limits / Standard Summary**

**14.1 Particulate Matter Emissions**

- 14.1.1 Particulate matter emissions from each cell of the reclaim cooling towers shall not exceed 17.65 lb/hr and 77.31 T/yr. The ton-per-year emissions limit shall be determined by multiplying the actual or allowable (if actual is not available) pound-per-hour emission rate by the actual hours per year the process(es) venting to this stack operate(s).

[Tier II Permit No. 077-00006, 12/3/99]

- 14.1.2 Based on the process weight rate equation the limit is 40.7 lb/hr per cell using a flowrate of 3,750 gpm per cell (30,000 gpm to the cooling tower). Because Condition 14.1.1 is more stringent, compliance with Condition 14.1.1 shall be deemed compliance with Condition 14.1.2.

[IDAPA 58.01.01.701, 4/5/00]

- 14.2 The PM<sub>10</sub> emissions from each cell of the reclaim cooling towers shall not exceed 3.53 lb/hr, and 15.48 T/yr. The ton-per-year emissions limit shall be determined by multiplying the actual or allowable (if actual is not available) pound-per-hour emission rate by the actual hours per year the process(es) venting to this stack operate(s).

[Tier II Permit No. 077-00006, 12/3/99]

- 14.3 Fluoride emissions from each cell of the reclaim cooling towers shall not exceed 4.9 lb/hr and 21.70 T/yr. The ton-per-year emissions limit shall be determined by multiplying the actual or allowable (if actual is not available) pound-per-hour emission rate by the actual hours per year the process(es) venting to this stack operate(s).

[Tier II Permit No. 077-00006, 12/3/99]

**Operating Requirements**

- 14.4 No owner or operator shall introduce into any evaporative cooling tower any liquid effluent from any wet scrubbing device installed to control emissions from process equipment. Each owner or operator of an affected source subject to this paragraph must certify to the Administrator annually that he/she has complied with the requirements contained in this section.

[40 CFR 63.602(e)]

- 14.5 The permittee shall operate the mist-eliminator control device at all times during operation of the reclaim cooling towers.

[IDAPA 58.01.01.322.01, 3/19/99]

**Monitoring and Record-keeping Requirements**

**14.6 PM and PM<sub>10</sub> Compliance Tests:**

- 14.6.1 The permittee shall conduct a compliance test within 12 months of, or 12 months prior to, December 24, 2002 to demonstrate compliance with the PM and PM<sub>10</sub> hourly emissions limits in Permit Conditions 14.1 and 14.2.

During calendar years 2003, 2004, and 2005, compliance with the PM<sub>10</sub> emissions limit in Permit Condition 14.2 shall be determined by conducting a Method 5 performance test on one of the cooling

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**Date Expires:** ~~December 24, 2005~~

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tower cells in each of the three reclaim cooling towers. The PM<sub>10</sub> fraction of the PM emission rate determined during the test shall be determined by multiplying the PM emission rate by a 0.20 conversion factor.

During calendar years 2004 and 2005, Method 5 and 202 performance tests shall be conducted on one of the cooling tower cells in each of the three reclaim cooling towers in addition to the Method 5 test. All performance testing shall be conducted in accordance with Permit Condition 2.16.

No later than September 30, 2005, Simplot shall submit a permit application to revise the PM<sub>10</sub> emissions limits to reflect the results of the Method 5 and 202 performance tests. The permit application shall contain justification for each emission limit proposed. Once DEQ issues a permit with revised PM<sub>10</sub> emissions limits, compliance with Permit Condition 14.2 shall be determined by annual source testing using Methods 5 and 202 on one of the cooling tower cells in each of the three reclaim cooling towers. The annual source test shall be conducted as specified in Permit Condition 14.8.

[IDAPA 58.01.01.322.06, 5/1/94; Tier II Permit No. 077-00006, 12/3/99]

14.6.2 Reserved.

14.6.3 The permittee shall conduct a visible emissions evaluation during each compliance test. The visible emissions evaluation shall be conducted in accordance with the procedures contained in IDAPA 58.01.01.625.

[Tier II Permit No. 077-00006, 12/3/99]

14.7 Total Fluorides Compliance Tests

14.7.1 The permittee shall conduct compliance tests within 12 months of, or 12 months prior to, December 24, 2002 to demonstrate compliance with the total fluorides hourly emissions limit in Permit Condition 14.3.

[IDAPA 58.01.01.322.06, 5/1/94; Tier II Permit No. 077-00006, 12/3/99]

14.7.2 The permittee shall conduct a visible emissions evaluation during each compliance test. The visible emissions evaluation shall be conducted in accordance with the procedures contained in IDAPA 58.01.01.625.

[IDAPA 58.01.01.322.06, 5/1/94; Tier II Permit No. 077-00006, 12/3/99]

14.7.3 After the first compliance test is fulfilled as required in this permit condition, the permittee shall conduct a compliance test once per annum to demonstrate compliance with the hourly total fluorides emissions limit in Permit Condition 14.3 as specified in Permit Condition 14.8.

[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00; Tier II Permit No. 077-00006, 12/3/99]

14.8 With respect to the compliance testing in Permit Condition 14.6 and 14.7, the permittee shall test one of the cooling tower cells in each of the three reclaim cooling towers. The permittee shall select different cooling tower cells for testing from year to year until all of the cells within a particular cooling tower have been tested. Once all cells in a cooling tower have been tested, the cell selection process shall start again.

[Tier II Permit No. 077-00006, 12/3/99]

14.9 Total Fluoride and PM/PM<sub>10</sub> Monitoring



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**Date Expires:** December 31, 2006

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

**Table 16.2 SUMMARY OF PERMIT REQUIREMENTS**

| Permit Condition | Parameter                                      | Permit Limit or Standard                                                                       | Applicable Standard                               | Monitoring and Reporting               |
|------------------|------------------------------------------------|------------------------------------------------------------------------------------------------|---------------------------------------------------|----------------------------------------|
| 16.1             | SO <sub>2</sub>                                | 170 lb/hr—three hour average, 750 T/yr, 4 lb/T of 100% H <sub>2</sub> SO <sub>4</sub> produced | 40 CFR 60.82; PTC No. 077-00006                   | 16.8, 16.9, 16.10, 16.11, 16.13, 16.14 |
| 16.2             | H <sub>2</sub> SO <sub>4</sub> mist            | 3 lb/hour—24-hr average, 13 T/yr; 0.15 lb/T of 100% H <sub>2</sub> SO <sub>4</sub> produced    | 40 CFR 60.83(1); PTC No. 077-00006                | 16.11, 16.13, 16.14                    |
| 16.3             | PM                                             | Process weight rate                                                                            | IDAPA 58.01.01.702                                | None                                   |
|                  | PM <sub>10</sub>                               | A source test is required to determine the emission rate.                                      | PTC No. 077-00006                                 | 16.8, 16.9, 16.11, 16.13, 16.14        |
| 16.4             | NO <sub>x</sub>                                | 64 T/yr                                                                                        | PTC No. 077-00006                                 | 16.8, 16.11, 16.13                     |
| 16.5             | NH <sub>3</sub>                                | 2.5 lb/hr, 11 T/yr                                                                             | PTC No. 077-00006                                 | 16.8, 16.9, 16.11, 16.13               |
| 16.6             | Opacity                                        | 10% for more than six-minute average                                                           | 40 CFR 60.83(2); PTC No. 077-00006                | 16.11, 16.12, 16.14                    |
| 16.7             | Visible emissions                              | 20%, no fugitive emissions leaving property boundary                                           | IDAPA 58.01.01.625; PTC No. 077-00006             | 16.12, 16.13, 16.14                    |
| 16.8             | 100% H <sub>2</sub> SO <sub>4</sub> Throughput | 1,750 T/day – rolling 24-hr average                                                            | PTC No. 077-00006                                 | 16.13                                  |
| 16.15            | SO <sub>2</sub>                                | Monitoring ground-level ambient SO <sub>2</sub> concentrations                                 | 40 CFR 52.675(b)(7); Tier II Permit No. 077-00006 | 17.8                                   |

**Permit Limits / Standard Summary**

- 16.1 Emissions of SO<sub>2</sub> shall not exceed 170 lb/hr calculated as a three-hour rolling average and 750 tons per any consecutive 12-month period. Emissions of SO<sub>2</sub> shall not exceed 4 lb/T of 100% sulfuric acid produced.

[40 CFR 60.82; PTC No. 077-00006, 6/15/01]

- 16.2 Emissions of sulfuric acid mist (as total H<sub>2</sub>SO<sub>4</sub>) shall not exceed 3 lb/hr calculated as a 24-hour rolling average and shall not exceed 13 tons per any consecutive 12-month period. Emissions of acid mist shall not exceed 0.15 lb/T of sulfuric acid produced, expressed as 100% H<sub>2</sub>SO<sub>4</sub>.

[40 CFR 60.83(1); PTC No. 077-00006, 6/15/01]

- 16.3 Particulate Matter

- 16.3.1 A source test will be required to determine the emission rate for PM<sub>10</sub>. This test was conducted and documented in a report dated 12/9/02.

[PTC No. 077-00006, 6/15/01]

- 16.3.2 No person shall emit PM to the atmosphere from any process or process equipment commencing operation on or after October 1, 1979, in excess of the amount shown by the following equations,

Where

E is the allowable emission from the entire source in lb/hr, and PW is the process weight in lb/hr.

- a. If PW is less than 9,250 lb/hr,

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**Location:** Pocatello, Idaho

T1-9507-114-1

**Date Expires:** December 24, 2007

*The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.*

~~At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions in accordance with 40 CFR 60.11(d), as contained in Appendix B.~~

**[40 CFR 60.11(d); PTC No. 077-00006, 6/46/Q1]**

**Monitoring And Record-keeping Requirements**

16.10 (a) A continuous monitoring system for the measurement of sulfur dioxide shall be installed, calibrated, maintained, and operated by the owner or operator. The pollutant gas used to prepare calibration gas mixtures under Performance Specification 2 and for calibration checks under 40 CFR 60.13(d), shall be sulfur dioxide. Method 8 shall be used for conducting monitoring system performance evaluations under 40 CFR 60.13(c) except that only the sulfur dioxide portion of the Method 8 results shall be used. The span value shall be set at 1000 ppm of sulfur dioxide.

(b) The owner or operator shall establish a conversion factor for the purpose of converting monitoring data into units of the applicable standard (kg/metric ton, lb/ton). The conversion factor shall be determined, as a minimum, three times daily by measuring the concentration of sulfur dioxide entering the converter using suitable methods (e.g., the Reich test, National Air Pollution Control Administration Publication No. 999-AP-13) and calculating the appropriate conversion factor for each eight-hour period as follows:

$$CF = k[(1.000 - 0.015r) / (r - s)]$$

Where:

CF = conversion factor (kg/metric ton per ppm, lb/ton per ppm).

k = constant derived from material balance. For determining CF in metric units, k = 0.0653. For determining CF in English units, k = 0.1306.

r = percentage of sulfur dioxide by volume entering the gas converter. Appropriate corrections must be made for air injection plants subject to the Administrator's approval.

s = percentage of sulfur dioxide by volume in the emissions to the atmosphere determined by the continuous monitoring system required under paragraph (a) of this section.

(c) The owner or operator shall record all conversion factors and values under paragraph

(b) of this section from which they were computed (i.e., CF, r, and s).

(d) Alternatively, a source that processes elemental sulfur or an ore that contains elemental sulfur and uses air to supply oxygen may use the following continuous emission monitoring approach and calculation procedures in determining SO<sub>2</sub> emission rates in terms of the standard. This procedure is not required, but is an alternative that would alleviate problems encountered in the measurement of gas velocities or production rate. Continuous emission monitoring systems for measuring SO<sub>2</sub>, O<sub>2</sub>, and CO<sub>2</sub> (if required) shall be installed, calibrated, maintained, and operated by the owner or operator and subjected to the certification procedures in Performance Specifications 2 and 3. The calibration procedure and span value for the SO<sub>2</sub> monitor shall be as specified in paragraph (b) of this section. The span value for CO<sub>2</sub> (if required) shall be 10% and for O<sub>2</sub> shall be 20.9% (air). A conversion factor based on process rate data is not necessary. Calculate the SO<sub>2</sub> emission rate as follows:

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T1-9507-114-1

**Date Expires:** ~~December 24, 2006~~

*The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.*

$$E_s = (C_s S) / [0.265 - (0.126 \%O_2) - (A \%CO_2)]$$

Where:

$E_s$  = emission rate of  $SO_2$ , kg/metric ton (lb/ton) of 100% of  $H_2SO_4$  produced.

$C_s$  = concentration of  $SO_2$ , kg/dscm (lb/dscf).

$S$  = acid production rate factor, 368 dscm/metric ton (11,800 dscf/ton) of 100%  $H_2SO_4$  produced.

$\%O_2$  = oxygen concentration, percent dry basis.

$A$  = auxiliary fuel factor.

= 0.00 for no fuel.

= 0.0226 for methane.

= 0.0217 for natural gas.

= 0.0196 for propane.

= 0.0172 for No 2 oil.

= 0.0161 for No 6 oil.

= 0.0148 for coal.

= 0.0126 for coke.

$\%CO_2$  = carbon dioxide concentration, percent dry basis.

Note: It is necessary in some cases to convert measured concentration units to other units for these calculations:

Use the following table for such conversions:

| From           | To     | Multiply by |
|----------------|--------|-------------|
| g/scm          | kg/scm | 0[-3]       |
| mg/scm         | kg/scm | 0[-6]       |
| ppm ( $SO_2$ ) | kg/scm | 0[-6]       |
| ppm ( $SO_2$ ) | lb/scf | 0[-7]       |

- (e) For the purpose of reports under 40 CFR 60.7(c), periods of excess emissions shall be all three-hour periods (or the arithmetic average of three consecutive one-hour periods) during which the integrated average sulfur dioxide emissions exceed the applicable standards in Permit Condition 16.1.

[40 CFR 60.84]

- 16.11 The permittee shall conduct performance tests to demonstrate that the pollution control equipment is capable of achieving pollutant-specific emission limits. The initial performance test, and any subsequent compliance tests conducted to demonstrate compliance, shall be performed in accordance with IDAPA 58.01.01.157, General Provision F of PTC No. 077-00006, dated 6/15/01, and the requirements outlined in the following subsections. The annual compliance tests shall be conducted within 13 months after the previous initial performance or compliance test.

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**Date Expires:** ~~December 24, 2007~~

*The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.*

General Provision F of PTC No. 077-00006 reads as follows:

"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 DEQ approval. Testing procedures and specific time limitations may be modified by DEQ by prior negotiation if conditions warrant adjustment. 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 DEQ 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 DEQ, 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."

[PTC No. 077-00006, 6/15/01]

**16.11.1 Sulfur Dioxide and Sulfuric Acid Mist**

Method 8 (or an alternative method approved by both DEQ and EPA in accordance with IDAPA 58.01.01.157) shall be used to determine the concentration of SO<sub>2</sub>. The performance tests shall also include a performance evaluation of the CEMS. Method 8 (or an alternative method approved by both DEQ and EPA in accordance with IDAPA 58.01.01.157) shall be used to determine the concentration of H<sub>2</sub>SO<sub>4</sub>.

In conducting the performance tests required in 40 CFR 60.8, the owner or operator shall use as reference methods and procedures the test methods in Appendix A of 40 CFR 60 or other methods and procedures as specified in this section, except as provided in 40 CFR 60.8(b). Acceptable alternative methods and procedures are given in paragraph (c) of this section.

(b) The owner or operator shall determine compliance with the SO<sub>2</sub>, acid mist, and visible emission standards in Permit Conditions 16.1, 16.2, and 16.6 as follows:

(1) The emission rate (E) of acid mist or SO<sub>2</sub>, shall be computed for each run using the following equation:

$$E = (CQ_{ad}) / (PK)$$

Where:

E = emission rate of acid mist or SO<sub>2</sub> kg/metric ton (lb/ton) of 100% H<sub>2</sub>SO<sub>4</sub> produced.

C = concentration of acid mist or SO<sub>2</sub>, g/dscm (lb/dscf).

Q<sub>ad</sub> = volumetric flow rate of the effluent gas, dscm/hr (dscf/hr).

P = production rate of 100% H<sub>2</sub>SO<sub>4</sub>, metric ton/hr (ton/hr).

K = conversion factor, 1000 g/kg (1.0 lb/lb).

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- (2) Method 8 shall be used to determine the acid mist and SO<sub>2</sub> concentrations (C's) and the volumetric flow rate (Q<sub>sd</sub>) of the effluent gas. The moisture content may be considered to be zero. The sampling time and sample volume for each run shall be at least 60 minutes and 1.15 dscm (40.6 dscf).
- (3) Suitable methods shall be used to determine the production rate (P) of 100% H<sub>2</sub>SO<sub>4</sub> for each run. Material balance over the production system shall be used to confirm the production rate.
- (4) Method 9 and the procedures in 40 CFR 60.11 shall be used to determine opacity.
- (c) The owner or operator may use the following as alternatives to the reference methods and procedures specified in this section:
  - (1) If a source processes elemental sulfur or an ore that contains elemental sulfur and uses air to supply oxygen, the following procedure may be used instead of determining the volumetric flow rate and production rate:
    - (i) The integrated technique of Method 3 is used to determine the O<sub>2</sub> concentration and, if required, CO<sub>2</sub> concentration.
    - (ii) The SO<sub>2</sub> or acid mist emission rate is calculated as described in Permit Condition 16.10(d), substituting the acid mist concentration for C's as appropriate.

[40 CFR 60.8 and 60.85; PTC No. 077-00006, 6/15/01]

- 16.11.2 The performance test for NO<sub>x</sub> shall be conducted in accordance with IDAPA 58.01.01.157. The test shall use the reference methods and procedures described in 40 CFR 60, Appendix A. Method 7 (or an alternative method approved by DEQ in accordance with IDAPA 58.01.01.157) shall be used to determine the concentration of NO<sub>x</sub>.

[PTC No. 077-00006, 6/15/01]

- 16.11.3 A performance test shall be conducted to evaluate total PM<sub>10</sub> from the sulfuric acid plant No. 300 and to establish an emissions factor for setting an emissions limit. The test shall use the reference methods and procedures described in 40 CFR 51, Appendix M. Method 201A and Method 202 (or alternative methods approved by DEQ in accordance with IDAPA 58.01.01.157) shall be used to determine the concentration of PM<sub>10</sub>.

[PTC No. 077-00006, 6/15/01]

- 16.11.4 The performance test for NH<sub>3</sub> shall be conducted in accordance with IDAPA 58.01.01.157.

[PTC No. 077-00006, 6/15/01]

- 16.11.5 Visible emissions shall be observed during each performance test run using the methods specified in EPA Reference Method 9 and IDAPA 58.01.01.625.

[40 CFR 60.8 and 60.85; PTC No. 077-00006, 6/15/01]

- 16.11.6 The production rate in pounds per hour and tons per day and the operating parameters shall be recorded during each performance test.

[PTC No. 077-00006, 6/15/01]

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**Location:** Pocatello, Idaho

T1-9507-114-1

**Date Expires:** December 24, 2007

*The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.*

**Permit Limits / Standard Summary**

- 17.1 The SO<sub>2</sub> emissions shall not exceed 4 lb/T of 100% sulfuric acid produced and 999 pounds per each running 3-hour period (whichever is more restrictive). In addition, SO<sub>2</sub> emissions shall not exceed 1,458 T/yr. The ton-per-year emission rate shall be determined by multiplying the actual, or allowable (if actual is not available), pound-per-hour emissions by the actual hours per year the process(es) venting to this stack operate(s).

[40 CFR 60.82(a); Tier II Permit No. 077-00006, 12/3/99]

- 17.2 Sulfuric acid mist emissions shall not exceed 0.15 lb/T of 100% sulfuric acid produced and 12.5 lb/hr (whichever is more restrictive). Sulfuric acid mist emissions shall also not exceed 54.8 T/yr. The ton-per-year emission rate shall be determined by multiplying the actual, or allowable (if actual is not available), pound-per-hour emissions by the actual hours per year the process(es) venting to this stack operate(s).

[40 CFR 60.83(a)(1); Tier II Permit No. 077-00006, 12/3/99]

- 17.3 Visible emissions shall not exhibit 10% opacity, or greater, as determined using the U.S. EPA Reference Method 9 and procedures in 40 CFR 60.11. The opacity standards set forth here shall apply at all times except during periods of startup, shutdown, and malfunction.

[40 CFR 60.83(a)(2), 40 CFR 60.85(b)(4), 40 CFR 60.11(c); Tier II Permit No. 077-00006, 12/3/99]

- 17.4 No person shall emit PM to the atmosphere from any process or process equipment commencing operation on or after October 1, 1979, in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in lb/hr, and PW is the process weight in lb/hr.

- a. If PW is less than 9,250 lb/hr,

$$E = 0.045(PW)^{0.60}$$

- b. If PW is equal to or greater than 9,250 lb/hr,

$$E = 1.10(PW)^{0.25}$$

[IDAPA 58.01.01.701, 4/5/00]

**Operating Requirements**

- 17.5 The production rate of sulfuric acid plant No. 400 processes shall be determined during the tests required in Permit Condition 17.10. The maximum production during the following year shall not exceed 105% of the rate achieved during the tests unless Permit Conditions 17.5.1 through 17.5.5 are met.

[Tier II Permit No. 077-00006, 12/3/99]

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**Date Expires:** ~~December 24, 2005~~

*The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.*

- 17.5.1 The SO<sub>2</sub> monitor is calibrated at least once every 24 hours using certified test gases, one of which has an SO<sub>2</sub> concentration equal to or less than the expected stack gas SO<sub>2</sub> concentration, and one of which has an SO<sub>2</sub> concentration greater than the expected stack gas SO<sub>2</sub> concentration.  
[Tier II Permit No. 077-00006, 12/3/99]
- 17.5.2 The calibrated SO<sub>2</sub> monitor is cross-checked and agrees with the initial compliance test, which demonstrates SO<sub>2</sub> emission limit compliance.  
[Tier II Permit No. 077-00006, 12/3/99]
- 17.5.3 Prior written approval by DEQ is received.  
[Tier II Permit No. 077-00006, 12/3/99]
- 17.5.4 An emission test is performed at the requested increased emission rate, and the test demonstrates that the continuous emission monitor is accurate at the increased rate.  
[Tier II Permit No. 077-00006, 12/3/99]
- 17.5.5 The SO<sub>2</sub> and acid mist emission limits will not be violated at the requested increased emission rates.  
[Tier II Permit No. 077-00006, 12/3/99]
- 17.6 At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions in accordance with 40 CFR 60.11(d).

[40 CFR 60.11(d)]

**Monitoring Requirements**

**17.7 Continuous Emissions Monitoring**

- (a) A continuous monitoring system for the measurement of sulfur dioxide shall be installed, calibrated, maintained, and operated by the owner or operator. The pollutant gas used to prepare calibration gas mixtures under Performance Specification 2 and for calibration checks under 40 CFR 60.13(d), shall be sulfur dioxide. Method 8 shall be used for conducting monitoring system performance evaluations under 40 CFR 60.13(c) except that only the sulfur dioxide portion of the Method 8 results shall be used. The span value shall be set at 1000 ppm of sulfur dioxide.
- (b) The owner or operator shall establish a conversion factor for the purpose of converting monitoring data into units of the applicable standard (kg/metric ton, lb/ton). The conversion factor shall be determined, as a minimum, three times daily by measuring the concentration of sulfur dioxide entering the converter using suitable methods (e.g., the Reich test, National Air Pollution Control Administration Publication No. 999-AP-13) and calculating the appropriate conversion factor for each eight-hour period as follows:

$$CF = k[(1.000 - 0.015r) / (r - s)]$$

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**Date Expires:** December 31, 2007

*The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.*

Where:

- CF = conversion factor (kg/metric ton per ppm, lb/ton per ppm).  
k = constant derived from material balance. For determining CF in metric units,  $k = 0.0653$ .  
For determining CF in English units,  $k = 0.1306$ .  
r = percentage of sulfur dioxide by volume entering the gas converter. Appropriate corrections must be made for air injection plants subject to the Administrator's approval.  
s = percentage of sulfur dioxide by volume in the emissions to the atmosphere determined by the continuous monitoring system required under paragraph (a) of this section.

- (c) The owner or operator shall record all conversion factors and values under paragraph (b) of this section from which they were computed (i.e., CF, r, and s).
- (d) Alternatively, a source that processes elemental sulfur or an ore that contains elemental sulfur and uses air to supply oxygen may use the following continuous emission monitoring approach and calculation procedures in determining SO<sub>2</sub> emission rates in terms of the standard. This procedure is not required, but is an alternative that would alleviate problems encountered in the measurement of gas velocities or production rate. Continuous emission monitoring systems for measuring SO<sub>2</sub>, O<sub>2</sub>, and CO<sub>2</sub> (if required) shall be installed, calibrated, maintained, and operated by the owner or operator and subjected to the certification procedures in Performance Specifications 2 and 3. The calibration procedure and span value for the SO<sub>2</sub> monitor shall be as specified in paragraph (b) of this section. The span value for CO<sub>2</sub> (if required) shall be 10% and for O<sub>2</sub> shall be 20.9% (air). A conversion factor based on process rate data is not necessary. Calculate the SO<sub>2</sub> emission rate as follows:

$$E_s = (C_s S) / [0.265 - (0.126 \%O_2) - (A \%CO_2)]$$

Where:

- E<sub>2</sub> = emission rate of SO<sub>2</sub>, kg/metric ton (lb/ton) of 100% of H<sub>2</sub>SO<sub>4</sub> produced.  
C<sub>s</sub> = concentration of SO<sub>2</sub>, kg/dscm (lb/dscf).  
S = acid production rate factor, 368 dscm/metric ton (11,800 dscf/ton) of 100% H<sub>2</sub>SO<sub>4</sub> produced.  
%O<sub>2</sub> = oxygen concentration, percent dry basis.  
A = auxiliary fuel factor.  
= 0.00 for no fuel.  
= 0.0226 for methane.  
= 0.0217 for natural gas.  
= 0.0196 for propane.  
= 0.0172 for No 2 oil.  
= 0.0161 for No 6 oil.  
= 0.0148 for coal.  
= 0.0126 for coke.  
%CO<sub>2</sub> = carbon dioxide concentration, percent dry basis.



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**Date Expires:** December 31, 2005

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Note: It is necessary in some cases to convert measured concentration units to other units for these calculations:

Use the following table for such conversions:

|                        |        |                        |
|------------------------|--------|------------------------|
| g/scm                  | kg/scm | $10^{-3}$              |
| mg/scm                 | kg/scm | $10^{-6}$              |
| ppm (SO <sub>2</sub> ) | kg/scm | $2.660 \times 10^{-6}$ |
| ppm (SO <sub>2</sub> ) | lb/scf | $1.660 \times 10^{-7}$ |

[40 CFR 60.84(a), (b), (c), and (d); Tier II Permit No. 077-00006, 12/3/99]

**17.8 Monitoring Ground Level Ambient SO<sub>2</sub> Concentrations**

- 17.8.1 The permittee shall, by September 30, 1976, install, calibrate, maintain and operate a network for continuously monitoring ground-level ambient SO<sub>2</sub> concentrations along with wind speed and direction in accordance with 40 CFR 52.675(b)(7).

[40 CFR 52.675(b)(7); Tier II Permit No. 077-00006, 12/3/99]

- 17.8.2 The permittee shall operate the SO<sub>2</sub> monitors in their present locations, as specified in 40 CFR 50 and 40 CFR 58. For specific methods and quality control, follow EPA's "Quality Assurance Handbook for Air Pollution Measurement Systems".

[Tier II Permit No. 077-00006, 12/3/99]

- 17.8.3 Annual audits of the monitor's performance will be conducted by DEQ or other auditors approved by DEQ. Audit results will be sent in writing to DEQ within 45 days after the audit and will be performed in accordance with 40 CFR 58.

- 17.9 Opacity shall be determined using the Method 9 procedures contained in IDAPA 58.01.01.625. On a monthly basis, the permittee shall monitor and record the visible emissions observations complete with conditions at the time of observation. The records shall be kept at the facility for the most recent five-year period and shall be made available to DEQ representatives upon request.

[IDAPA 58.01.01.322.07, 5/1/94; PTC No. 077-00006, 6/15/01]

**Performance Tests and Compliance Procedures**

- 17.10 Annual SO<sub>2</sub> and H<sub>2</sub>SO<sub>4</sub> mist emissions tests shall be performed. All emission tests shall be performed at the process equipment's maximum operating rate.

[Tier II Permit No. 077-00006, 12/3/99]

- 17.11 (a) In conducting the performance tests, the owner or operator shall use as reference methods and procedures the test methods in Appendix A of 40 CFR 60 or other methods and procedures as specified in this section, except as provided in 40 CFR 60.8(b). Acceptable alternative methods and procedures are given in paragraph (c) of this section.

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**Location:** Pocatello, Idaho

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**Date Expires:** ~~December 31, 2004~~

*The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.*

- (b) The owner or operator shall determine compliance with the SO<sub>2</sub>, acid mist, and visible emission standards in Permit Conditions 17.1, 17.2, and 17.3 as follows:
- (1) The emission rate (E) of acid mist or SO<sub>2</sub>, shall be computed for each run using the following equation:

$$E = (CQ_{ad}) / (PK)$$

Where:

- E = emission rate of acid mist or SO<sub>2</sub> kg/metric ton (lb/ton) of 100% H<sub>2</sub>SO<sub>4</sub> produced.  
C = concentration of acid mist or SO<sub>2</sub>, g/dscm (lb/dscf).  
Q<sub>ad</sub> = volumetric flow rate of the effluent gas, dscm/hr (dscf/hr).  
P = production rate of 100% H<sub>2</sub>SO<sub>4</sub>, metric ton/hr (ton/hr).  
K = conversion factor, 1000 g/kg (1.0 lb/lb).
- (2) Method 8 shall be used to determine the acid mist and SO<sub>2</sub> concentrations (C's) and the volumetric flow rate (Q<sub>ad</sub>) of the effluent gas. The moisture content may be considered to be zero. The sampling time and sample volume for each run shall be at least 60 minutes and 1.15 dscm (40.6 dscf).
- (3) Suitable methods shall be used to determine the production rate (P) of 100% H<sub>2</sub>SO<sub>4</sub> for each run. Material balance over the production system shall be used to confirm the production rate.
- (4) Method 9 and the procedures in 40 CFR 60.11 shall be used to determine opacity.
- (c) The owner or operator may use the following as alternatives to the reference methods and procedures specified in this section:
- (1) If a source processes elemental sulfur or an ore that contains elemental sulfur and uses air to supply oxygen, the following procedure may be used instead of determining the volumetric flow rate and production rate:
- (i) The integrated technique of Method 3 is used to determine the O<sub>2</sub> concentration and, if required, CO<sub>2</sub> concentration.
- (ii) The SO<sub>2</sub> or acid mist emission rate is calculated as described in Permit Condition 17.7, substituting the acid mist concentration for C's as appropriate.

[IDAPA 58.01.01.322.06, 5/1/94; Tier II Permit No. 077-00006, 12/3/99]

**~~Reporting Requirements~~**

- 17.12 For the purpose of reports required under 40 CFR 60.7(c), periods of excess emissions shall be defined as all three-hour periods (or the arithmetic average of three consecutive one-hour periods) during which the integrated average SO<sub>2</sub> emissions exceed the applicable standards in Permit Condition 17.1.

[40 CFR 60.84(e)]

IDAHO DEPARTMENT OF ENVIRONMENTAL QUALITY

IN THE MATTER OF

J. R. Simplot Company – Don Siding Plant )  
Highway 30 and I-86 )  
Pocatello, Idaho )

**COMPLIANCE AGREEMENT &  
VOLUNTARY ORDER**  
Idaho Code § 39-116A

1. Pursuant to Idaho Environmental Protection and Health Act (EPHA), Idaho Code § 39-116A, the Idaho Department of Environmental Quality (DEQ) enters into this Compliance Agreement and Voluntary Order (Agreement) with J. R. Simplot Company – (Simplot), a Nevada Corporation.
2. Simplot owns and operates a fertilizer manufacturing plant in Pocatello, Idaho. The plant is known as the Don Siding Plant (Don Plant), an air pollution source regulated under the EPHA and the *Rules for the Control of Air Pollution in Idaho (Rules)*, IDAPA 58.01.01.001 through 999.
3. Section 172(c)(1) of the Clean Air Act requires state implementation plans for nonattainment areas to implement reasonably available control measures (RACM), including reasonably available control technology (RACT), for existing stationary sources. 42 USC 7502(c)(1).
4. The Don Plant is located within the Portneuf Valley PM<sub>10</sub> nonattainment area. The Environmental Protection Agency determined that the Portneuf Valley area met the PM<sub>10</sub> standard by the attainment date of December 31, 1996. 67 Fed. Reg. 48552 (July 25, 2002). The State of Idaho is submitting a SIP containing RACT/RACM to EPA to support its request to redesignate the area to attainment under section 107(d)(3) of the Clean Air Act. 42 USC 7407(d)(3).
5. DEQ has determined that the provisions of this Agreement constitute RACT for PM<sub>10</sub> emissions and secondary aerosol (PM<sub>10</sub>) emissions of NO<sub>x</sub> and SO<sub>2</sub> in light of the attainment needs of the area for the specific sources listed. DEQ's assessment of the RACT documentation is contained in the Reasonably Available Control Technology Analysis.
6. The Don Plant has existing limits in Tier I Operating Permit No. 077-00006, dated April 5, 2004, that are considered RACT for the following sources and pollutants:
  - No. 300 Sulfuric Acid Plant: SO<sub>2</sub>, NO<sub>x</sub> and NH<sub>3</sub>
  - No. 400 Sulfuric Acid Plant: SO<sub>2</sub>
  - No. 400 Phosphoric Acid Plant: PM<sub>10</sub>
  - Granulation No. 3 Plant: PM<sub>10</sub>
  - Reclaim Cooling Towers: PM<sub>10</sub>
  - B&W Boiler: NO<sub>x</sub>
  - HPB&W Boiler: NO<sub>x</sub>
7. In order to resolve this matter without litigation or further controversy, and making no

admission of fact or law, Simplot agrees to the provisions of this Agreement and the following terms and actions which shall be implemented to set RACT limits at the Don Plant\_\_\_\_\_

#### NO. 300 SULFURIC ACID PLANT

8. Emissions from the No. 300 sulfuric acid plant shall not exceed the emissions limits in Table 1.

Table 1. NO. 300 SULFURIC ACID PLANT EMISSIONS LIMITS

| Source Description                | PM <sub>10</sub>   |        | NO <sub>x</sub>    |
|-----------------------------------|--------------------|--------|--------------------|
|                                   | lb/hr <sup>1</sup> | T/yr   | lb/hr <sup>1</sup> |
| No. 300 Sulfuric Acid Plant Stack | Note A             | Note A | 16.0               |

<sup>1</sup> 24-hour average

Note A: Limit shall be set in accordance with condition 9

9. The hourly PM<sub>10</sub> RACT emissions limit (pounds per hour) for the No. 300 sulfuric acid plant shall be set by conducting five performance tests on the sulfuric acid plant stack. The limit will be determined based on the 95% confidence interval: limit = average of five tests plus 1.96 times the standard deviation of the five tests. The annual PM<sub>10</sub> RACT limit (tons per year) shall be set by multiplying the pound per hour RACT limit by 8760 hours per year and dividing by 2000 pounds per ton. The first performance test shall be conducted prior to December 30, 2004, and tests shall be conducted annually thereafter. The sum of the emissions measured from Method 5 and 202 shall be considered PM<sub>10</sub>.

#### NO. 400 SULFURIC ACID PLANT

10. Emissions from the No. 400 sulfuric acid plant shall not exceed the emissions limits in Table 2.

Table 2. NO. 400 SULFURIC ACID PLANT EMISSIONS LIMITS

| Source Description                | PM <sub>10</sub>   |        | NO <sub>x</sub>    |        |
|-----------------------------------|--------------------|--------|--------------------|--------|
|                                   | lb/hr <sup>1</sup> | T/yr   | lb/hr <sup>1</sup> | T/yr   |
| No. 400 Sulfuric Acid Plant Stack | Note A             | Note A | Note B             | Note B |

<sup>1</sup> 24-hour average

Note A: Limit shall be set in accordance with condition 11

Note B: Limit shall be set in accordance with condition 12

11. The hourly PM<sub>10</sub> RACT emissions limit (pounds per hour) for the No. 400 sulfuric acid plant shall be set by conducting five performance tests on the sulfuric acid plant stack. The limit will be determined based on the 95% confidence interval: limit = average of five tests plus 1.96 times the standard deviation of the five tests. The annual PM<sub>10</sub> RACT limit (tons per year) shall be set by multiplying the pound per hour RACT limit by 8760 hours per year and dividing by 2000 pounds per ton. The first performance test shall be conducted prior to December 30, 2004, and tests shall be conducted annually thereafter. The sum of the emissions measured from Method 5 and 202 shall be considered PM<sub>10</sub>.

12. The hourly NO<sub>x</sub> RACT emissions limit (pounds per hour) for the No. 400 sulfuric acid plant shall be set by conducting five performance tests on the sulfuric acid plant stack. The limit will be determined based on the 95% confidence interval: limit = average of five tests plus 1.96 times the standard deviation of the five tests. The annual NO<sub>x</sub> RACT limit (tons per year) shall be set by multiplying the pound per hour RACT limit by 8760 hours per year and dividing by 2000 pounds per ton. The first performance test shall be conducted prior to December 30, 2004, and tests shall be conducted annually thereafter.
13. ~~The permittee shall monitor and record the production rate of the No. 400 sulfuric acid plant in tons per hour, tons per rolling 24-hour period, and tons per any consecutive 12-month period.~~

### GRANULATION NO. 1 PLANT

14. Emissions from the granulation No. 1 plant shall not exceed the emissions limits in Table 3.

Table 3. GRANULATION NO. 1 PLANT EMISSIONS LIMITS

| Source Description       | PM/PM <sub>10</sub> |      |
|--------------------------|---------------------|------|
|                          | lb/hr               | T/yr |
| Reactor/granulator stack | 10.9                | 47.7 |
| Dryer stack              |                     |      |
| Baghouse stack           |                     |      |

### GRANULATION NO. 2 PLANT

15. Emissions from the granulation No. 2 plant shall not exceed the emissions limits in Table 4.

Table 4. GRANULATION NO. 2 PLANT EMISSIONS LIMITS

| Source Description     | PM/PM <sub>10</sub> |      |
|------------------------|---------------------|------|
|                        | lb/hr               | T/yr |
| Tailgas scrubber stack | 10.7                | 46.9 |
| Baghouse stack         |                     |      |

### COMPLIANCE AND PERFORMANCE TESTING

16. All 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 the testing does not satisfy the testing requirements. Therefore, prior to conducting any compliance test, the permittee is strongly encouraged to submit in writing to DEQ, at least 30 days in advance, the following for approval:

- The type of method to be used
- Any extenuating or unusual circumstances regarding the proposed test
- The proposed schedule for conducting and reporting the test

## DEQ REVIEW AND APPROVAL PROCESS

17. All correspondence sent by Simplot to DEQ shall be addressed to:

Tiffany Floyd  
Air Quality Manager  
Idaho Department of Environmental Quality  
Pocatello Regional Office  
444 Hospital Way, #300  
Pocatello, ID 83201

and a copy shall also be sent to:

Pat Nair  
Stationary Source Program Manager  
Idaho Department of Environmental Quality  
1410 North Hilton  
Boise, ID 83706

18. All correspondence sent by DEQ to Simplot shall be addressed to:

Delbert Butler  
Plant Manager  
J. R. Simplot Company - Don Siding Plant  
P. O. Box 912  
Pocatello, ID 83204

and a copy shall also be sent to:

Alan Prouty  
Director, Environmental & Regulatory Affairs  
J. R. Simplot Company  
P. O. Box 27  
Boise, ID 83707

Terry T. Uhling  
Sr. VP, Sec. & Gen. Counsel  
J.R. Simplot Company  
PO Box 27  
Boise, ID 83707

19. This Agreement shall not relieve Simplot from its obligation to comply with any of the provisions of the EPHA, the Rules, any provisions of an air quality permit issued by DEQ to Simplot, or other applicable local, state, or federal law and regulations
20. Simplot expressly recognizes that failure to comply with the terms of this Agreement may result in a district court action for specific performance of the Agreement, civil penalties, assessment of costs, restraining orders, injunctions and other relief available under law.
21. If any event occurs that causes, or may cause, delay in the achievement of any requirement of this Agreement, Simplot shall notify DEQ in writing within ten days of the date Simplot knew, or should have known, of the delay. Any notice under this paragraph shall describe in detail the anticipated length of the delay, all anticipated consequences of the delay, measures taken by Simplot to prevent or minimize the delay, and a timetable by which those measures shall be implemented. Simplot shall utilize all reasonable measures to avoid or minimize

~~any such delay. If DEQ determines that the delay or anticipated delay in achieving any requirements of this Agreement has been or will be caused by circumstances beyond the reasonable control of Simplot, DEQ may grant an extension for a period equal to the length of the delay. The burden of proving that any delay is caused by circumstances beyond the reasonable control of Simplot shall rest wholly with Simplot.~~

- ~~22. The Parties may modify the terms and conditions of this Agreement by a writing signed by both Parties. Any such written modification shall be incorporated into this Agreement and be enforceable as if included herein.~~
- ~~23. The effective date of this Agreement shall be the date of the signature by the Director of the Idaho Department of Environmental Quality.~~

DATED THIS 13 day of April, 2004

  
TERRY UHLING, SENIOR VP, SEC & GENERAL COUNSEL  
AUTHORIZED REPRESENTATIVE OF J. R. SIMPLOT COMPANY - DON SIDING PLANT

DATED THIS 16<sup>th</sup> day of April, 2004

  
C. STEPHEN ALLRED, DIRECTOR  
IDAHO DEPARTMENT OF ENVIRONMENTAL QUALITY

**The Amalgamated Sugar Company LLC – Nampa Factory**  
**T2-2009.0105 12/23/11**

**EPA-APPROVED IDAHO SOURCE-SPECIFIC REQUIREMENTS**

The following conditions: 1.2, including the table of Regulated Emission Point Sources Table, 3.2, 3.3 (first paragraph only), 3.4, 3.5, 3.6, 3.7, 3.8, 3.9, 3.11, 3.13, 3.14, 3.15, 3.16, and 4.1.





**Air Quality  
TIER II OPERATING PERMIT**

**State of Idaho  
Department of Environmental Quality**

**PERMIT No.:** T2-2009.0105

**FACILITY ID No.:** 027-00010

**AQCR:** 64    **CLASS:** A    **ZONE:** 11

**SIC:** 2063    **NAICS:** 311313

**UTM COORDINATE (km):** 534.5, 4828.0

**1. PERMITTEE**

The Amalgamated Sugar Company LLC – Nampa Factory (TASCO)

**2. PROJECT**

Project No. 60867, BART Tier II Operating Permit

**3. MAILING ADDRESS**

P.O. Box 8787

**CITY**

Nampa

**STATE**

ID

**ZIP**

83653-8787

**4. FACILITY CONTACT**

Glen Patrick

**TITLE**

Plant Environmental Manager

**TELEPHONE**

(208) 468-6883

**5. RESPONSIBLE OFFICIAL**

Kent Quinney

**TITLE**

Plant Manager

**TELEPHONE**

(208) 466-3541

**6. EXACT PLANT LOCATION**

138 W. Karcher Ave., Nampa, Idaho

**COUNTY**

Canyon

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

Beet Sugar Manufacturing

**8. PERMIT AUTHORITY**

This permit is issued according to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.400 through 410, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit.

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.

MORRIE LEWIS, PERMIT WRITER  
DEPARTMENT OF ENVIRONMENTAL QUALITY

MIKE SIMON, STATIONARY SOURCE PROGRAM MANAGER  
DEPARTMENT OF ENVIRONMENTAL QUALITY

**Date Issued:**

**December 23, 2011**

**Date Modified/Revised:**

**Date Expires:**

**December 23, 2016**

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## Acronyms, Units, and Chemical Nomenclature

|                  |                                                                                                                                      |
|------------------|--------------------------------------------------------------------------------------------------------------------------------------|
| AQCR             | Air Quality Control Region                                                                                                           |
| BART             | Best Available Retrofit Technology                                                                                                   |
| B&W              | Babcock & Wilcox                                                                                                                     |
| CAA              | Clean Air Act                                                                                                                        |
| CAM              | Compliance Assurance Monitoring                                                                                                      |
| CFR              | Code of Federal Regulations                                                                                                          |
| CO               | carbon monoxide                                                                                                                      |
| DEQ              | Department of Environmental Quality                                                                                                  |
| EPA              | U.S. Environmental Protection Agency                                                                                                 |
| fpm              | feet per minute                                                                                                                      |
| gpm              | gallons per minute                                                                                                                   |
| IDAPA            | a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act |
| iwg              | inches of water gauge                                                                                                                |
| lb/hr            | pounds per hour                                                                                                                      |
| lb steam/hr      | pounds of steam output per hour                                                                                                      |
| LNBs             | low NO <sub>x</sub> burners when firing coal                                                                                         |
| MMBTU/hr         | million British thermal units per hour                                                                                               |
| MMscf/hr         | million standard cubic feet per hour                                                                                                 |
| NAAQS            | National Ambient Air Quality Standards                                                                                               |
| NAICS            | North American Industry Classification System                                                                                        |
| NO <sub>2</sub>  | nitrogen dioxide                                                                                                                     |
| NO <sub>x</sub>  | nitrogen oxides                                                                                                                      |
| NSPS             | New Source Performance Standards                                                                                                     |
| O&M              | operations and maintenance                                                                                                           |
| PM               | particulate matter                                                                                                                   |
| PM <sub>10</sub> | particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers                                       |
| PSD              | prevention of significant deterioration of air quality                                                                               |
| SIC              | Standard Industrial Classification                                                                                                   |
| SIP              | State Implementation Plan                                                                                                            |
| SO <sub>2</sub>  | sulfur dioxide                                                                                                                       |
| SO <sub>x</sub>  | sulfur oxides                                                                                                                        |
| TAP              | toxic air pollutants                                                                                                                 |
| TASCO            | The Amalgamated Sugar Company, LLC – Nampa Factory                                                                                   |
| T/hr             | tons per hour                                                                                                                        |
| U.S.C.           | United States Code                                                                                                                   |
| UTM              | Universal Transverse Mercator                                                                                                        |
| VOC              | volatile organic compounds                                                                                                           |

# 1. TIER II OPERATING PERMIT SCOPE

## Purpose

- 1.1 The purpose of this Tier II Operating Permit is to establish Best Available Retrofit Technology (BART) and BART Alternative emission standards and requirements for the TASCOS Riley Boiler and Nampa factory in accordance with 40 CFR 51.308(e) and IDAPA 58.01.01.668.

This permit is not effective until a revised Regional Haze State Implementation Plan (RH SIP) is approved by the U.S. Environmental Protection Agency (EPA) which incorporates BART requirements from this permit.

Upon the effective date of a revised RH SIP, this permit supersedes Tier II Operating Permit No. T2-2009.0105 issued on September 7, 2010.

## Regulated Sources

- 1.2 The emission sources regulated by this permit are listed in the following Regulated Emission Point Sources Table.

REGULATED EMISSION POINT SOURCES TABLE

| Permit Section | Source Description                                                                                                                                                                                                                                                                                                                                                                                                               | Control Equipment Descriptions                                                                                                                                                                                                         |
|----------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 2 & 3          | <u>Riley Boiler (S-B3)</u><br>Installation Date: 1969<br>Rated steam capacity: 250,000 lb steam/hr<br>Maximum capacity: 350 MMBTU/hr<br>Maximum operation: 8,760 hr/yr<br>Fuel types: coal, natural gas                                                                                                                                                                                                                          | <u>Baghouse (A-B3)</u><br>Manufacturer: Envirotech Corp.<br>Control efficiency: ≥99.0% for PM (BART for PM)<br><br><u>Coal-Firing LNBs</u><br>Control efficiency: ≥60.7% for NO <sub>x</sub> (BART for NO <sub>x</sub> )               |
|                | <u>B&amp;W Boiler #1 (S-B1)</u><br>Installation Date: 1942<br>Rated steam capacity: 105,000 lb steam/hr<br>Maximum capacity: 126 MMBTU/hr<br>Maximum operation: 8,760 hr/yr<br>Fuel types: coal, natural gas<br><br><u>B&amp;W Boiler #2 (S-B2)</u><br>Installation Date: 1942<br>Rated steam capacity: 105,000 lb steam/hr<br>Maximum capacity: 126 MMBTU/hr<br>Maximum operation: 8,760 hr/yr<br>Fuel types: coal, natural gas | <u>Coal-Firing LNBs</u><br>Control efficiency: ≥55% for NO <sub>x</sub> (BART Alternative for SO <sub>2</sub> )<br><br><u>Coal-Firing LNBs</u><br>Control efficiency: ≥55% for NO <sub>x</sub> (BART Alternative for SO <sub>2</sub> ) |
| 2 & 4          | <u>Pulp Dryers (S-D1, S-D2, and S-D3)</u>                                                                                                                                                                                                                                                                                                                                                                                        | <u>Permanent shutdown</u> (BART Alternative for SO <sub>2</sub> )                                                                                                                                                                      |

## **2. FACILITY-WIDE CONDITIONS**

### ***Obligation to Comply***

- 2.1 Receiving a Tier II operating permit shall not relieve any owner or operator of the responsibility to comply with all applicable local, state, and federal rules and regulations, in accordance with IDAPA 58.01.01.406.

### ***Incorporation of Federal Requirements by Reference***

- 2.2 Unless expressly provided otherwise, any reference in this permit to any document identified in IDAPA 58.01.01.107.03 shall constitute the full incorporation into this permit of that document for the purposes of the reference, including any notes and appendices therein, in accordance with IDAPA 58.01.01.107. Documents include, but are not limited to:

- Protection of Visibility, 40 CFR Part 51, Subpart P, Section 308 – Best Available Retrofit Technology (BART) requirements

For permit conditions referencing or cited in accordance with any document incorporated by reference (including permit conditions identified as BART and CAM), should there be any conflict between the requirements of the permit condition and the requirements of the document, the requirements of the document shall govern, including any amendments.

### ***DEQ Address***

- 2.3 Any reporting required by this permit, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, notifications of intent to test, 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. Any reporting required by this permit shall be submitted to the following address:

Air Quality Permit Compliance  
Department of Environmental Quality  
Boise Regional Office  
1445 N. Orchard  
Boise, ID 83706

Phone: (208) 373-0550  
Fax: (208) 373-0287

### ***Performance Testing***

- 2.4 When testing is required, the following test methods shall be used to measure the pollutant emissions unless otherwise approved by DEQ in accordance with IDAPA 58.01.01.157.

**TEST METHODS**

| <b>Pollutant</b> | <b>Test Method</b>                 |
|------------------|------------------------------------|
| PM <sub>10</sub> | EPA Method 201.a<br>and Method 202 |
| NO <sub>x</sub>  | EPA Method 7                       |
| SO <sub>2</sub>  | EPA Method 6                       |
| CO               | EPA Method 10                      |

### 3. BOILERS

#### 3.1 Process Description

The Nampa factory operates three industrial boilers each fired by pulverized coal and/or natural gas to supply steam and generate electricity for processing of sugar beets into sugar and byproducts, including animal feed at the Nampa facility. These boilers are the one Riley Boiler and two Babcock & Wilcox (B&W) Boilers.

#### 3.2 BART and BART Alternative Control Equipment Descriptions

- BART for the control of PM emissions is the existing Baghouse (A-B3) on the Riley Boiler.
- BART for the control of NO<sub>x</sub> emissions is Coal-Firing LNBs on the Riley Boiler.
- The BART Alternative to the control of SO<sub>2</sub> emissions is Coal-Firing LNBs on B&W Boiler #1 and Coal-Firing LNBs on B&W Boiler #2 for the control of NO<sub>x</sub>, and shutdown of the three coal-fired Pulp Dryers (S-D1, S-D2, and S-D3) for the control of PM, NO<sub>x</sub>, and SO<sub>2</sub>.

#### **Compliance Dates**

#### 3.3 BART 40 CFR 51.308, Subpart P – BART Control Equipment Installation and Operation Due Date

Unless the Riley Boiler is fired with natural gas only, the permittee shall install and operate BART and BART Alternative controls (Permit Conditions 3.6 and 3.7) as expeditiously as practicable, but in no event later than July 22, 2016, in accordance with IDAPA 58.01.01.668.04 and 40 CFR 51.308(e)(1)(iv).

The permittee may submit a request to obtain DEQ-approved BART alternatives and to revise this permit in accordance with IDAPA 58.01.01.404.04. DEQ will process the request in accordance with IDAPA 58.01.01.404. The request must be submitted timely such that any revisions to this permit and the corresponding revision to the RH SIP are approved prior to July 22, 2016. Pursuant to Section 110(k)(2) of the Clean Air Act, EPA has 12 months to act on a requested SIP revision.

#### **Emissions Limits**

#### 3.4 BART 40 CFR 51.308, Subpart P – BART Emission Limits

On and after July 22, 2016, emissions from the Riley Boiler shall not exceed any corresponding emission rate limit listed in the following BART Emission Limits Table, in accordance with 40 CFR 51.308(e) and IDAPA 58.01.01.668.

**BART EMISSION LIMITS TABLE <sup>(a)</sup>**

| Source Description | PM <sub>10</sub><br>lb/hr <sup>(b)(c)</sup> | NO <sub>x</sub><br>lb/hr <sup>(b)(c)</sup> |
|--------------------|---------------------------------------------|--------------------------------------------|
| Riley Boiler       | 12.4                                        | 147                                        |

<sup>a)</sup> In absence of any other credible evidence, compliance is assured by complying with permit operating, monitoring, and recordkeeping requirements.

<sup>b)</sup> Pounds per hour as determined by the prescribed test method (Permit Condition 2.4), or alternative test method approved by DEQ in accordance with IDAPA 58.01.01.157.

<sup>c)</sup> BART emission rate limit established pursuant to 40 CFR 51.308(e).

#### 3.5 BART 40 CFR 51.308, Subpart P – BART Alternative Emission Limits

At all times the Riley Boiler is fired with coal on and after July 22, 2016, emissions from the B&W Boiler #1 and B&W Boiler #2 combined shall not exceed any corresponding emission rate limit listed in the following BART Alternative Emission Limits Table, in accordance with 40 CFR 51.308(e) and IDAPA 58.01.01.668.

**BART ALTERNATIVE EMISSION LIMITS TABLE <sup>(a)</sup>**

| <b>Source Description</b>                 | <b>NO<sub>x</sub><br/>lb/hr <sup>(b)(c)</sup></b> |
|-------------------------------------------|---------------------------------------------------|
| B&W Boiler #1 and B&W Boiler #2, combined | 103                                               |

- a) In absence of any other credible evidence, compliance is assured by complying with permit operating, monitoring, and recordkeeping requirements.
- b) Pounds per hour as determined by the prescribed test method (Permit Condition 2.4), or alternative test method approved by DEQ in accordance with IDAPA 58.01.01.157.
- c) BART Alternative emission rate limit established pursuant to 40 CFR 51.308(e)(2).

## ***Operating Requirements***

### **3.6 BART 40 CFR 51.308, Subpart P – Baghouse Control Equipment**

At all times the Riley Boiler is fired with coal on and after July 22, 2016, the permittee shall operate Baghouse (A-B3) to control PM emissions from the Riley Boiler to ensure compliance with the PM<sub>10</sub> emission limit (Permit Condition 3.4), in accordance with 40 CFR 51.308(e) and IDAPA 58.01.01.668. The baghouse need not be operated during periods when the Riley Boiler is being fired exclusively with natural gas.

### **3.7 BART 40 CFR 51.308, Subpart P – Coal-Firing LNBs**

At all times the Riley Boiler is fired with coal on and after July 22, 2016, the permittee shall:

- Operate Riley Boiler Coal-Firing LNBs at all times the Riley Boiler is fired by coal, to ensure compliance with the relevant NO<sub>x</sub> emission limit (Permit Condition 3.4). The Coal-Firing LNBs shall have a maximum rated heat input capacity (highest heating value) of less than or equal to 350 MMBTU/hr.
- Operate B&W Boiler #1 Coal-Firing LNBs at all times the B&W Boiler #1 is fired by coal, to ensure compliance with the relevant NO<sub>x</sub> emission limit (Permit Condition 3.5). The Coal-Firing LNBs shall have a maximum rated heat input capacity (highest heating value) of less than or equal to 126 MMBTU/hr.
- Operate B&W Boiler #2 Coal-Firing LNBs at all times the B&W Boiler #2 is fired by coal, to ensure compliance with the relevant NO<sub>x</sub> emission limit (Permit Condition 3.5). The Coal-Firing LNBs shall have a maximum rated heat input capacity (highest heating value) of less than or equal to 126 MMBTU/hr.

### **3.8 BART 40 CFR 51.308, Subpart P – Maintenance of BART Equipment**

On and after July 22, 2016 the permittee shall maintain each required BART control equipment (if required by Permit Conditions 3.3 or 3.6) and establish procedures to ensure such equipment is properly operated and maintained, in accordance with IDAPA 58.01.01.668.05 and 40 CFR 51.308(e)(1)(v).

### **3.9 Riley Boiler Fuels**

- Unless complying with the Coal-Firing LNBs requirements (Permit Condition 3.7), on and after July 22, 2016 the Riley Boiler shall be fired using natural gas only.
- On and after July 22, 2016, the Riley Boiler shall not be fired with coal until such date that the Coal-Firing LNBs are installed and operated in accordance with Permit Condition 3.7.

## ***Monitoring and Recordkeeping Requirements***

### **3.10 Operation and Maintenance Manuals**

Within 180 days after installation of Coal-Firing LNBs (Permit Condition 3.7), the permittee shall develop and submit to DEQ an Operation and Maintenance (O&M) manual for review and comment at the address provided (Permit Condition 2.3). Any changes to the O&M manual shall be submitted to DEQ for review and comment within 15 days of the change.

- The O&M manual shall describe for the installed control equipment described in the Regulated Emission Point Sources Table (Permit Condition 1.2), procedures that will be followed to ensure compliance with emission limits (Permit Conditions 3.4 and 3.5), the maintenance of BART equipment requirement (Permit Condition 3.8), the control equipment maintenance and operation general provision (General Provision 2), and the manufacturer's specifications. The O&M manual shall be developed by the permittee based upon, but independent of, the manufacturer supplied operating manual(s).
- The permittee shall operate control equipment in accordance with the O&M manual. The procedures specified in the O&M manual are incorporated by reference into this permit and are enforceable permit conditions. The O&M manual and copies of any manufacturer's manual(s) and recommendations shall remain on site at all times and shall be made available to DEQ representatives upon request.
- Procedures for periodic calibration of the pressure drop monitor associated with Baghouse (A-B3), including calibration to an accuracy of within  $\pm 5\%$  inches of water gauge. The monitor shall be calibrated on at least an annual basis or as specified by the manufacturer.

## ***Performance Testing Requirements***

### **3.11 BART Initial Performance Tests**

- On or before December 20, 2016, performance tests shall be conducted on the Riley Boiler exhaust to demonstrate compliance with the following emission limit, in accordance with IDAPA 58.01.01.405 and IDAPA 58.01.01.157:
  - The Riley Boiler PM<sub>10</sub> emission limit in pounds per hour (Permit Condition 3.4)
- Within 180 days of initial startup of Coal-Firing LNBs (Permit Condition 3.7), performance tests shall be conducted on the Riley Boiler exhaust and the B&W Boilers exhaust to demonstrate compliance with the following emission limits, in accordance with IDAPA 58.01.01.405 and IDAPA 58.01.01.157:
  - The Riley Boiler NO<sub>x</sub> emission limit in pounds per hour (Permit Condition 3.4)
  - The B&W Boilers combined NO<sub>x</sub> emission limit in pounds per hour (Permit Condition 3.5)

### **3.12 CO Initial Performance Tests**

Within 180 days of initial startup of the Coal-Firing LNBs (Permit Condition 3.7), performance tests shall be conducted on the Riley Boiler and B&W Boilers exhaust stacks to determine the following emission rates, in accordance with IDAPA 58.01.01.405 and IDAPA 58.01.01.157:

- The Riley Boiler CO emissions in pounds per hour,
- The B&W Boilers combined CO emissions in pounds per hour



### **3.13 Periodic Performance Testing**

After completing the BART initial performance tests, performance tests to determine PM<sub>10</sub> and NO<sub>x</sub> emissions from the Riley Boiler exhaust and to determine NO<sub>x</sub> emissions from the B&W Boilers exhaust shall be conducted as described in Permit Condition 3.11 during the Beet Campaign each year, in accordance with IDAPA 58.01.01.405 and IDAPA 58.01.01.157, unless another testing frequency has been approved by DEQ. For the purposes of this requirement, the Beet Campaign shall be defined as October through February of each year.

### **3.14 Performance Test Conditions, Monitoring, and Recordkeeping**

Each required performance test (Permit Conditions 3.11 through 3.13) shall be conducted using an approved test method (Permit Condition 2.4) and under the following conditions unless otherwise approved by DEQ, in accordance with IDAPA 58.01.01.405, IDAPA 58.01.01.157, and General Provision 6:

- Emissions shall be measured while combusting coal fuel in the boiler(s) being tested
- Three separate test runs shall be conducted for each performance test
- The permittee shall monitor and record the following during each performance test for the boiler tested, unless otherwise approved by DEQ:
  - Steam production rate of the boiler, in pounds per hour (lb steam/hr), once every 15 minutes;
  - Coal feed rate to the boiler, in tons per hour (T/hr), once every 15 minutes (the coal feed rate may be determined using alternate relevant operational parameter(s) and a calculation method which has been approved by DEQ);
  - Natural gas firing rate of the boiler, in million standard cubic feet per hour (MMscf/hr), once every 15 minutes;
  - Highest heating value and analysis results of the coal fuel fired, including ash content; and
  - Pressure drop across Baghouse (A-B3) during each Riley Boiler PM<sub>10</sub> test, in inches water gauge (iwg), once every 15 minutes.

### **3.15 Performance Test Reporting**

The permittee shall submit performance test reports to DEQ which include records of the monitoring required (Permit Condition 3.14) and in accordance with the performance testing general provision (General Provision 6). Performance test reports shall be submitted by the permittee to the DEQ address provided (Permit Condition 2.3).

## ***Compliance Notifications***

### **3.16 BART Compliance Notifications**

- If coal-firing LNBs have not been installed by July 22, 2016 (Permit Condition 3.7), the permittee shall provide written notification to DEQ describing the method(s) used on the Riley Boiler to disable coal-firing and to ensure that coal is not fired in the Riley Boiler (Permit Condition 3.9) until the coal-firing LNBs have been installed.
- Notification of the anticipated date of initial startup of Coal-Firing LNBs (Permit Condition 3.7) shall be provided not more than sixty days or less than thirty days prior to such date as provided in General Provision 5.
- Notifications shall be submitted to the DEQ address provided (Permit Condition 2.3).

#### **4. SOUTH PULP DRYER**

##### ***Operating Requirements***

##### **4.1 BART 40 CFR 51.308, Subpart P – Shutdown of South Pulp Dryer**

The permittee shall permanently shut down the South Pulp Dryer (S-D1).

## **5. TIER II PERMIT TO OPERATE GENERAL PROVISIONS**

### ***General Compliance***

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.

[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.

[IDAPA 58.01.01.405, 5/1/94]

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 58.01.01.406, 5/1/94]

### ***Inspection and Entry***

4. Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:
  - a. Enter upon the permittee's premises where an emissions source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;
  - b. Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
  - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d. 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***

5. The permittee shall furnish DEQ written notifications as follows:
  - a. A notification of the date of initiation of construction, within five working days after occurrence;
  - b. A notification of the date of any suspension of construction, if such suspension lasts for one year or more;
  - c. 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;
  - d. A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and

- e. A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.405, 5/1/94]

### ***Performance Testing***

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.

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.

[IDAPA 58.01.01.157, 4/5/00]

### ***Monitoring and Recordkeeping***

7. The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Records of monitoring information 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 and 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 58.01.01.405, 5/1/94]

### ***Excess Emissions***

8. The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.  
[IDAPA 58.01.01.130-136, 4/5/00]

### ***Certification***

9. 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***

10. 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***

11. 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]

### ***Expiration and Renewal***

12. This permit shall be renewable on the expiration date, provided the permittee submits an application for renewal to the Department and continues to meet all terms and conditions contained in the permit. The expiration of this permit will not affect the operation of the stationary source of facility during the administrative procedure period associated with the permit renewal process.  
[IDAPA 58.01.01.404.04, 7/1/02]

### ***Transferability***

13. This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.404.05.  
[IDAPA 58.01.01.404.05, 4/11/06]

## **P4 Production, L.L.C., Soda Springs, Idaho**

**T2-2009.0109 11/17/2009**

### **EPA-APPROVED IDAHO SOURCE-SPECIFIC REQUIREMENTS**

The following conditions: 1.2 (including Table 1.1), 2.3, 2.4, 2.5, 2.6, 2.7, and 2.8.



**Air Quality  
TIER II OPERATING PERMIT**

**State of Idaho  
Department of Environmental Quality**

**PERMIT No.:** T2-2009.0109

**FACILITY ID No.:** 029-00001

**AQCR:** 61    **CLASS:** A    **ZONE:** 12

**SIC:** 2819    **NAICS:** 325188

**UTM COORDINATE (km):** 452.0, 4726.0

**1. PERMITTEE**

P4 Production, L.L.C.

**2. PROJECT**

DEQ-initiated BART Tier II operating permit

**3. MAILING ADDRESS**

P. O. Box 816

**CITY**

Soda Springs

**STATE**

ID

**ZIP**

83276

**4. FACILITY CONTACT**

Carol Adams

**TITLE**

Senior Environmental Engineer

**TELEPHONE**

(208) 547-1224

**5. RESPONSIBLE OFFICIAL**

Sheldon D. Alver

**TITLE**

Plant Manager

**TELEPHONE**

(208) 547-1318

**6. EXACT PLANT LOCATION**

Two miles north of Soda Springs, Idaho, on Highway 34

**COUNTY**

Caribou

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

Elemental phosphorus production

**8. PERMIT AUTHORITY**

This permit is issued according to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.400 through 410, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit.

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.

CAROLE ZUNDEL, PERMIT WRITER  
DEPARTMENT OF ENVIRONMENTAL QUALITY

MIKE SIMON, STATIONARY SOURCE PROGRAM MANAGER  
DEPARTMENT OF ENVIRONMENTAL QUALITY

**Date Issued:**

November 17, 2009

**Date Modified/Revised:**

**Date Expires:**

November 17, 2014

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## Acronyms, Units, and Chemical Nomenclature

|                  |                                                                                                                                      |
|------------------|--------------------------------------------------------------------------------------------------------------------------------------|
| AQCR             | Air Quality Control Region                                                                                                           |
| BART             | Best available retrofit technology                                                                                                   |
| CFR              | Code of Federal Regulations                                                                                                          |
| DEQ              | Department of Environmental Quality                                                                                                  |
| EPA              | U.S. Environmental Protection Agency                                                                                                 |
| IDAPA            | a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act |
| km               | kilometers                                                                                                                           |
| lb/hr            | pounds per hour                                                                                                                      |
| LCDA             | lime concentrated dual alkali                                                                                                        |
| NAICS            | North American Industry Classification System                                                                                        |
| O&M              | operations and maintenance                                                                                                           |
| PM               | particulate matter                                                                                                                   |
| PM <sub>10</sub> | particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers                                       |
| SIC              | Standard Industrial Classification                                                                                                   |
| SO <sub>2</sub>  | sulfur dioxide                                                                                                                       |
| T/yr             | tons per year                                                                                                                        |
| UTM              | Universal Transverse Mercator                                                                                                        |

## 1. TIER II OPERATING PERMIT SCOPE

### ***Purpose***

- 1.1 The purpose of this permit is to establish permit requirements as required in 40 CFR 51.308(e) and IDAPA 58.01.01.668 for Best Available Retrofit Technology (BART).

### ***Regulated Sources***

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

**Table 1.1 REGULATED SOURCES**

| <b>Permit Section</b> | <b>Source Description</b> | <b>Emissions Control</b>                                                       |
|-----------------------|---------------------------|--------------------------------------------------------------------------------|
| 2.0                   | Kiln                      | Four parallel Hydro-Sonic scrubbers<br>SO <sub>2</sub> scrubbing system (LCDA) |

## **2. PHOSPHATE ORE NODULIZING KILN**

### **2.1 Process Description**

Phosphate ore must be nodulized in a rotary kiln in preparation for use in the furnace feedstock. Blended ore is added to the kiln where it is heated to the point of incipient fusion. The tumbling action of the kiln causes the ore to agglomerate into balls referred to as raw nodules. These raw nodules pass through a cooling and crushing process. A portion of the resulting raw nodules is routed directly into the nodule crushing and screening process while the remainder of the raw nodules is stockpiled for future use. The kiln's exhaust gas is routed through an emission control system that includes a dust knockout chamber for large particulate removal, a spray tower used to capture soluble gases and fine particulate matter, and four parallel hydrosonic scrubbing systems that remove submicron dust particles and entrained particulate-laden water. The nodule cooling process generates both point and fugitive particulate matter that is controlled by a wet scrubbing system.

### **2.2 Emission Control Description**

P4 Production's phosphate ore nodulizing kiln has particulate emissions, including polonium-210, and SO<sub>2</sub> emissions. The particulate emissions are controlled by a dust knockout chamber, North spray tower, eight parallel cyclonic separators, four parallel Hydro-Sonic scrubbers and demisters, and SO<sub>2</sub> scrubbing system. A spray tower controls emissions from the nodule cooler. The kiln SO<sub>2</sub> emissions are controlled by a lime concentrated dual alkali (LCDA) SO<sub>2</sub> scrubbing system. This system consists of Hydro-Sonic scrubbers that absorb SO<sub>2</sub> with a solution of sodium salts. Some sodium sulfate is produced. The spent solution of sodium sulfite/bisulfite/sulfate is continuously withdrawn to a dual-reactor system, where it is reacted with hydrated lime. The lime regenerates the scrubbing solution and precipitates calcium sulfite/sulfate solids. The solids are removed from the system through thickening and filtration, and the regenerated solution is returned to the scrubber as feed material. The LCDA installation includes raw material storage tanks, two reactor tanks, thickener/clarifier, filtration (feed tank with vacuum filtering process), and a double lined landfill with leachate collection.

**Table 2.1 KILN DESCRIPTION**

| <b>Emissions Unit(s) / Process(es)</b> | <b>SO<sub>2</sub> Emissions Control Device</b>                               |
|----------------------------------------|------------------------------------------------------------------------------|
| Kiln                                   | Four parallel Hydro-Sonic scrubbers<br>LCDA SO <sub>2</sub> scrubbing system |

### ***Emissions Limits***

#### **2.3 BART 40 CFR 51.308(e) Emission Limits**

Emissions from the kiln shall not exceed 143 lb/hr, on a three-hour average, of SO<sub>2</sub> in accordance with 40 CFR 51.308(e).

### ***Operating Requirements***

#### **2.4 BART 40 CFR 51.308(e)(1)(v) and IDAPA 58.01.01.668.05 pH Limit**

The one-hour average pH of the scrubbing solution measured in the recirculation tank shall not be less than 6.1 in accordance with 40 CFR 51.308(e)(1)(v) and IDAPA 58.01.01.668.05.

## ***Monitoring and Recordkeeping Requirements***

### **2.5 BART 40 CFR 51.308(e)(1)(v) and IDAPA 58.01.01.668.05 Hydrosonic and LCDA Scrubbing System Operation**

The hydrosonic and LCDA scrubbing system shall be operated any time the kiln is in operation in accordance with 40 CFR 51.308(e)(1)(v) and IDAPA 58.01.01.668.05 .

### **2.6 BART 40 CFR 51.308(e)(1)(v) and IDAPA 58.01.01.668.05 pH Monitoring Requirement**

The permittee shall monitor and record the pH of the scrubbing solution measured in the recirculation tank at least once per hour when the system is operating in accordance with 40 CFR 51.308(e)(1)(v) and IDAPA 58.01.01.668.05. The record shall be kept at the facility for the most recent five-year period and shall be made available to Department representatives upon request.

### **2.7 BART 40 CFR 51.308(e)(1)(v) and IDAPA 58.01.01.668.05 Operations and Maintenance Manual**

Within 60 days after startup, the permittee shall have developed an O&M manual for the hydrosonic scrubber system and the LCDA system which describes the procedures that will be followed to comply with General Provision 2 for these systems in accordance with 40 CFR 51.308(e)(1)(v) and IDAPA 58.01.01.668.05. The manual shall be updated as needed to reflect any change in operating parameters, including scrubber solution flow rate and pressure drop across the scrubber, from the most recent performance test that demonstrated compliance. This manual shall remain onsite at all times and shall be made available to Department representatives upon request.

### **2.8 BART 40 CFR 51.308(e)(1)(v) and IDAPA 58.01.01.668.05 SO<sub>2</sub> Performance Tests for Kiln Hydro Sonics**

The permittee shall conduct performance tests to measure SO<sub>2</sub> emissions from the kiln Hydro Sonics scrubber stacks according to the schedule in this permit condition. The performance testing will be conducted to demonstrate compliance with the emission rate limits listed in Permit Condition 2.3 in accordance with 40 CFR 51.308(e)(1)(v) and IDAPA 58.01.01.668.05.

Each performance test shall be performed in accordance with IDAPA 58.01.01.157 and General Provision 6 of this permit. The following information shall be recorded during each performance test:

- Amount of kiln feed processed in the kiln, in tons per hour
- Pressure drop across the scrubber
- Scrubber solution flow rate
- pH in the recirculation tank

After the initial performance test, future testing shall be performed according to the following schedule. If the SO<sub>2</sub> emission rate measured in the most recent test is less than or equal to 75% of the applicable emission standard in Permit Condition 2.3, the next test shall be conducted within five years of the test date. If the SO<sub>2</sub> emission rate measured during the most recent performance test is greater than 75%, but less than or equal to 90%, of the emission standard in Permit Condition 2.3, the next test shall be conducted within two years of the test date. If the SO<sub>2</sub> emission rate measured during the most recent performance test is greater than 90% of the emission standard in Permit Condition 2.3, the next test shall be conducted within one year of the test date.

### **3. TIER II PERMIT TO OPERATE GENERAL PROVISIONS**

#### ***General Compliance***

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[Idaho Code §39-101, et seq.]
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### ***False Statements***

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