



State of Idaho
Department of Environmental Quality
Air Quality Division

**AIR QUALITY PERMIT
STATEMENT OF BASIS**

Permit to Construct No. P-2009.0014

Final

Crop Production Services, Inc.

Caldwell, Idaho

Facility ID No. 027-00089

March 10, 2009

Harbi Elshafei *H.E.*

Permit Writer

The purpose of this Statement of Basis is to satisfy the requirements of IDAPA 58.01.01. et seq, Rules for the Control of Air Pollution in Idaho, for issuing air permits.

1. FACILITY INFORMATION

1.1 Permitting Action and Facility Permitting History

This Permit to Construct (PTC) is for a change in ownership name of the facility's existing permit number P-050028 from Western Farm Service to Crop Production Services, Inc. (CPS). The following information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

- February 28, 2006 P-050028, initial PTC. The permit regulates emissions from Reactor No.1 (10-34-0 reactor). The reactor was constructed at the facility without first obtaining a PTC. The application for this PTC was submitted by the permittee pursuant to the February 15, 2005 Consent Order No. E-030014 to resolve certain regulatory alleged by DEQ. The Consent Order is not yet terminated by DEQ. (A, however, the status will become "S" upon issuance of this permit).

2. APPLICATION SCOPE AND APPLICATION CHRONOLOGY

2.1 Application Scope

This permit is a revision of the facility's currently effective PTC. The revision is to change the name of the facility from Western Farm Service located in Caldwell, Idaho to CPS. The facility's contact and the responsible official remain the same as in the current permit.

2.2 Application Chronology

- February 2, 2009 DEQ received application for the name change of the facility from Western Farm Service to CPS.

3. REGULATORY REVIEW

3.1 Permit Revision

This permit is for a revision of the PTC in accordance with IDAPA 58.01.01.209.04 to change the name of the facility from Western Farm Service to CPS. No request to change to the company's facility's contact or to the company's responsible official.

DEQ included a NAICS (North American Industry Classification System) code on the cover page of this permit and an updated General Provisions to reflect changes that have been made to the PTC. The NAICS for this facility is 325312, *Phosphatic Fertilizer Manufacturing*.

In Permit Condition 2.6 (Operation and Maintenance Manual Requirements), the first sentence is changed from "Within 60 days of the permit issuance, the permittee..." to the following: "The permittee shall maintain and implement an O&M manual..."

4. PERMIT FEES

No PTC application or processing fees are required, in accordance with IDAPA 58.01.01.224.03 and IDAPA 58.01.01.225.

5. PUBLIC COMMENT

Public comment is not required for this permit revision in accordance with IDAPA 58.01.01.209.04.

Appendix A – AIRS Information

AIRS/AFS Facility-wide Classification Form

Facility Name: Crop Production Services
Facility Location: Caldwell, Idaho
Facility ID: 027-00089 **Date:** 3/10/2009
Project/Permit No.: P-2009.0014 **Completed By:** Harbi Elshafei

- Check if there are no changes to the facilitywide classification resulting from this action. (compare to form with last permit)
- Yes, this facility is an SM80 source.

Identify the facility's area classification as A (attainment), N (nonattainment), or U (unclassified) for the following pollutants:

	SO2	PM10	VOC	
Area Classification:	U	U	U	DO NOT LEAVE ANY BLANK

Check one of the following:

- SIP [0]** - Yes, this facility is subject to SIP requirements. (do not use if facility is Title V)
- OR
- Title V [V]** - Yes, this facility is subject to Title V requirements. (If yes, do not also use SIP listed above.)

For SIP or TV, identify the classification (A, SM, B, C, or ND) for the pollutants listed below. Leave box blank if pollutant is not applicable to facility.

	SO2	NOx	CO	PM10	PT (PM)	VOC	THAP
Classification:	B	B	B	B	B	B	SM

- PSD [6]** - Yes, this facility has a PSD permit.

If yes, identify the pollutant(s) listed below that apply to PSD. Leave box blank if pollutant does not apply to PSD.

	SO2	NOx	CO	PM10	PT (PM)	VOC	THAP
Classification:	<input type="checkbox"/>						

- NSR - NAA [7]** - Yes, this facility is subject to NSR nonattainment area (IDAPA 58.01.01.204) requirements.

Note: As of 9/12/08, Idaho has no facility in this category.

If yes, identify the pollutant(s) listed below that apply to NSR-NAA. Leave box blank if pollutant does not apply to NSR - NAA.

	SO2	NOx	CO	PM10	PT (PM)	VOC	THAP
Classification:	<input type="checkbox"/>						

- NESHAP [8]** - Yes, this facility is subject to NESHAP (Part 61) requirements. (THAP only)

If yes, what CFR Subpart(s) is applicable?

- NSPS [9]** - Yes, this facility is subject to NSPS (Part 60) requirements.

If yes, what CFR Subpart(s) is applicable?

If yes, identify the pollutant(s) regulated by the subpart(s) listed above. Leave box blank if pollutant does not apply to the NSPS.

	SO2	NOx	CO	PM10	PT (PM)	VOC	THAP
Classification:	<input type="checkbox"/>						

- MACT [M]** - Yes, this facility is subject to MACT (Part 63) requirements. (THAP only)

If yes, what CFR Subpart(s) is applicable?