



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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www.deq.idaho.gov

C.L. "Butch" Otter, Governor
Curt Fransen, Director

December 18, 2014

Scott Lusty
Mine Manager
JR Simplot Company
Smoky Canyon Mine
P.O. Box 1270
Afton, WY 83110

RE: Facility ID No. 029-00021, JR Simplot Smoky Canyon Mine, 25 Miles East of Soda Springs,
Idaho Final Permit Letter

Dear Mr. Lusty:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2012.0012 Project 61435 to JR Simplot Company located 25 miles east of Soda Springs, Idaho for the removal of the coal fired boiler at the Smoky Canyon Mine. This PTC is issued in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho) and is based on the certified information provided in your PTC application received October 8, 2014.

This permit is effective immediately and replaces PTC No. P-2012.0012, issued on May 25, 2012. This permit does not release Smoky Canyon Mine from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Rick Elkins, Air Quality Analyst, at (208) 236-6160 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends that the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any other staff responsible for day-to-day compliance with permit conditions.

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

Sincerely,

A handwritten signature in black ink that reads "Mike Simon". The signature is written in a cursive, flowing style.

Mike Simon
Stationary Source Program Manager
Air Quality Division

MSRS

Permit No. P-2012.0012 PROJ 61435
Enclosures

Air Quality

PERMIT TO CONSTRUCT

Permittee J R Simplot Company Smoky Canyon Mine

Permit Number P-2012.0012

Project ID 61435

Facility ID 029-00021

Facility Location 25 Miles East of Soda Springs
Mailing Address: P.O. Box 1270, Afton, WY,
83110

Permit Authority

This permit (a) is issued according to the *Rules for the Control of Air Pollution in Idaho (Rules)*, IDAPA 58.01.01.200-228; (b) pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed or modified by this permit; (c) has been granted on the basis of design information presented with its application; (d) does not affect the title of the premises upon which the equipment is to be located; (e) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (f) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (g) in no manner implies or suggests that the Department of Environmental Quality (DEQ) or its officers, agents, or employees, assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment. Changes in design, equipment or operations may be considered a modification subject to DEQ review in accordance with IDAPA 58.01.01.200-228.

Date Issued December 18, 2014


Randy Stegen, Permit Writer


Mike Simon, Stationary Source Manager

1. PERMIT SCOPE..... 3

2. MINE AND MILL OPERATIONS 4

3. CRUSHER GENERATOR ENGINE 6

4. CRUSHER 7

5. GENERAL PROVISIONS 9

1. PERMIT SCOPE

Purpose

- 1.1 This is the revised permit to construct to remove the coal-fired boiler.
- 1.2 Those permit conditions that have been modified or revised by this permitting action are identified by the permit issue date citation located directly under the permit condition and in the right hand margin.
- 1.3 This PTC replaces the Permit to Construct issued May 25, 2012.

Regulated Sources

- 1.4 Table 1.1 lists all sources of regulated emissions in this permit.

Table 1.1 REGULATED SOURCES

Permit Section	Source	Control Equipment
2.	<u>Ore Handling and Slurrying</u> Grinder/Mill – 400 T/hr Screens – 400 T/hr	Fugitive dust control plan
2.	Surface Mine	
2. & 4.	<u>Crusher</u> Crush Boss Horizontal Shaft Impactor Serial No: 6356-541 Capacity: 400 T/hr	
3.	<u>Crusher Generator Set</u> Output: 910kW Fuel: #2 Fuel Oil	None
	<u>Portable Generators</u> Various models and sizes used for emergency power, heating, and illumination	None

[December 18, 2014]

2. Mine and Mill Operations

2.1 Process Description

Phosphate ore is mined and processed to make a slurry that is pumped to J R Simplot Don Siding Plant in Pocatello. Operations include drilling, blasting, loading, hauling, milling and preparing an ore slurry to be pumped to the Don Siding Plant in Pocatello. A portable crusher and associated generator set are used at the facility.

2.2 Emissions Control Description

Emissions from mine and mill operations are controlled by implementing good operating practices as presented in the J R Simplot Smoky Canyon Mine Fugitive Dust Control Plan.

Emission Limits

2.3 Opacity Limit

Emissions from 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 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

Operating Requirements

2.4 Reasonable Control of Fugitive Dust Emissions – Fugitive Dust Control Plan

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, consideration 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. To establish reasonable precautions, the Permittee shall maintain a Fugitive Dust Control Plan which identifies potential sources of fugitive dust and which establishes good operating practices for limiting the formation and dispersion of dust from those sources. The Fugitive Dust Control Plan is part of the terms and conditions of the permit.

The Fugitive Dust Control Plan (Plan) for the Smoky Canyon Mine shall, at a minimum, include information and establish requirements as follows:

1. A general description of the potential sources of fugitive dust from the facility.
2. Application of water from water trucks for control of dust in mining areas, haul roads and loadout areas. The Plan must establish specific, quantifiable, minimum frequencies for which the water must be applied. Water does not need to be applied when the surface is wet (i.e. during/following rainy conditions) or when reduced ambient temperatures may cause the water to freeze.
3. Application of suitable dust suppressant chemicals (e.g., magnesium chloride) to high traffic haul roads during the dry season. The Plan must specify a specific, quantifiable, minimum frequency for which the chemicals must be applied.
4. Establish procedures to minimize material drop heights and dust formation during truck loading operations and when dumping material from front-end loaders.
5. Establish procedures to minimize dust formation during crushing, conveying and screening operations.
6. Training/orientation of employees about the Plan procedures.
7. When in operation, the Permittee shall comply with the provisions in the Plan at all times. Whenever an operating parameter is outside the operating range specified by the plan, the permittee shall take corrective action as expeditiously as practicable to bring the operating parameter back within the operating range.

8. A copy of the Plan shall remain onsite at all times.

[May 25, 2012]

Monitoring and Recordkeeping Requirements

2.5 Fugitive Dust Monitoring – Periodic Inspections

The permittee shall conduct monthly facility-wide inspection of potential sources of fugitive dust emissions, during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive dust emissions are effective. If fugitive dust 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 dust emission 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 dust emissions were present (if observed), any corrective action taken in response to the fugitive dust emissions, and the date the corrective action was taken. All monitoring shall be in accordance with the general provisions of this permit.

[May 25, 2012]

2.6 Fugitive Dust Monitoring - Recordkeeping

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 dust emissions. All monitoring shall be in accordance with the general provisions of this permit.

[May 25, 2012]

3. Crusher Generator Engine

3.1 Process Description

The permittee utilizes a 910 kW electrical generator set to produce power for the portable crushing operation.

NSPS - 40 CFR 60 Subpart IIII

- 3.2 In accordance with 40 CFR 60.4207 fuel used in the crusher generator shall meet the requirements of 40 CFR 80.510(b) for nonroad diesel fuel.

[May 25, 2012]

- 3.3 In accordance with 40 CFR 60.4211 the permittee shall:

(1) Operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's emission-related written instructions;

(2) Change only those emission-related settings that are permitted by the manufacturer; and

(3) Meet the applicable requirements of 40 CFR parts 89, 94 and/or 1068.

[May 25, 2012]

- 3.4 In accordance with 40 CFR 60.4206 the permittee must operate and maintain the engine according to the manufacturer's emission-related written instructions over the entire life of the engine.

In accordance with 40 CFR 63.4211(g) if the permittee does not configure, operate, and maintain the engine and control device according to the manufacturer's emission-related written instructions, or changes emission-related settings in a way that is not permitted by the manufacturer, the permittee must demonstrate compliance as follows:

The permittee shall keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, the permittee must conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of startup, or within 1 year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within 1 year after the permittee changes emission-related settings in a way that is not permitted by the manufacturer. The permittee must conduct subsequent performance testing every 8,760 hours of engine operation or 3 years, whichever comes first, thereafter to demonstrate compliance with the applicable emission standards.

[May 25, 2012]

- 3.5 In accordance with 40 CFR 60.4211(c) the permittee must comply by purchasing an engine certified to the emission standards in §60.4204(b).

[May 25, 2012]

- 3.6 In accordance with 40 CFR 60.4212 if the permittee conducts performance test to comply the tests shall be conducted pursuant to 40 CFR 60.4212(a) through (e).

[May 25, 2012]

- 3.7 Should there be a conflict between Permit Conditions 3.2 through 3.7 and 40 CFR 60 Subpart IIII, 40 CFR 60 Subpart IIII shall govern including any amendments to that regulation.

[May 25, 2012]

- 3.8 The Permittee shall comply with the applicable provisions of 40 CFR 60 Subpart A.

[May 25, 2012]

4. Crusher

4.1 Process Description

Simplot operates a portable crushing operation at various locations at the facility.

Table 4.1 CRUSHING AND SCREENING DESCRIPTION

Emissions Units / Processes	Control Devices
<u>Crusher</u> Crush Boss Horizontal Shaft Impactor Serial No: 6356-541 Capacity: 400 T/hr	Reasonable Control
<u>Screens</u> Crush Boss Screens (2) Number of Decks (3 each) Serial #: 3620-130 & 4156-546	Reasonable Control

NSPS - 40 CFR 60 Subpart OOO

- 4.2 In accordance with 40 CFR 60.672(b), visible emissions from each screening operation shall not exceed 7 percent opacity.
[May 25, 2012]
- 4.3 In accordance with 40 CFR 60.672(b), visible emissions from the crusher shall not exceed 12 percent opacity.
[May 25, 2012]
- 4.4 In accordance with 40 CFR 60.675(c) compliance with opacity standard shall be determined using Method 9 and the procedures in 40 CFR 60.11 with the following additions:
- The minimum distance between the observer and the emission source shall be 4.57 meters (15 feet).
 - The observer shall, when possible, select a position that minimizes interference from other fugitive emission sources (e.g., road dust). The required observer position relative to the sun (Method 9 of Appendix A-4 of this part, Section 2.1) must be followed.
[May 25, 2012]
- 4.5 Should there be a conflict between Permit Conditions 4.2 through 4.4 and 40 CFR 60 Subpart OOO, 40 CFR 60 Subpart OOO shall govern including any amendments to that regulation.
[May 25, 2012]
- 4.6 NSPS 40 CFR 60, Subpart A –General Provisions
The permittee shall comply with the requirements of 40 CFR 60, Subpart A – General Provisions. A summary of the exception of applicability of the general provisions to Subpart OOO is provided in Table 4.2.

Table 4.2 EXCEPTION TO APPLICABILITY OF SUBPART A TO SOURCES AFFECTED BY SUBPART 000

Subpart A reference	Applies to subpart 000	Explanation
60.4, Address	Yes	All requests, reports, applications, submittals, and other communications associated with 40 CFR 60, Subpart(s) shall be submitted to: DEQ Pocatello Regional Office 444 Hospital Way, #300 Pocatello, ID 83201 Phone: 208-236-6160 Fax: 208-236-6168
60.7, Notification and recordkeeping	Yes	Except in (a)(1) notification of the date construction or reconstruction commenced (§60.676(h)) does not apply. Also, Simplot provided notification of initial startup on November 10, 2010.
		Also, except in (a)(6) performance tests involving only Method 9 (40 CFR part 60, Appendix A-4) require a 7-day advance notification instead of 30 days (§60.675(g)).
60.11, Compliance with standards and maintenance requirements	Yes	Except in (b) under certain conditions (§§60.675(c)), Method 9 (40 CFR part 60, Appendix A-4) observation is reduced from 3 hours to 30 minutes for fugitive emissions.

[May 25, 2012]

Emission Standards for Nonmetallic Mineral Processing Plants – IDAPA 58.01.01.792.04

- 4.7 In accordance with IDAPA 58.01.01.792.04, visible emissions resulting from vehicle traffic on, or wind erosion of, an unpaved haul road; and wind erosion of any stockpile shall not exceed 20% opacity for a period or periods aggregating more than 3 minutes in any 60 minute period. Opacity shall be determined using the test methods and procedures contained in Section 625. The plant is not required to have a certified opacity reader to demonstrate compliance with this standard.

[May 25, 2012]

5. GENERAL PROVISIONS

General Compliance

5.1 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.]

5.2 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 58.01.01.211, 5/1/94]

5.3 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 58.01.01.212.01, 5/1/94]

Inspection and Entry

5.4 Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:

- 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;
- Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
- Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
- 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

5.5 This permit shall expire if construction has not begun within two years of its issue date, or if construction is suspended for one year.

[IDAPA 58.01.01.211.02, 5/1/94]

5.6 The permittee shall furnish DEQ written notifications as follows:

- A notification of the date of initiation of construction, within five working days after occurrence; except in the case where pre-permit construction approval has been granted then notification shall be made within five working days after occurrence or within five working days after permit issuance whichever is later;
- A notification of the date of any suspension of construction, if such suspension lasts for one year or more;

- 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; and
- A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
- A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211.03, 5/1/94]

Performance Testing

- 5.7 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.
- 5.8 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.
- 5.9 Within 60 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

- 5.10 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 58.01.01.211, 5/1/94]

Excess Emissions

- 5.11 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

- 5.12 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

- 5.13 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

- 5.14 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]

Transferability

- 5.15 This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

[IDAPA 58.01.01.209.06, 4/11/06]

Severability

- 5.16 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.

[IDAPA 58.01.01.211, 5/1/94]