



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

C.L. "Butch" Otter, Governor
Toni Hardesty, Director

September 15, 2009

Scott Clelland
Manager, Operations Compliance
Crop Production Services, Inc.
473 Hankins Road South
Kimberly, ID 83341-5095

RE: Facility ID No. 051-00020, Crop Production Services, Inc., Roberts
Final Permit Letter

Dear Mr. Clelland:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2009.0087 to Crop Production Services, Inc. for a boiler replacement project for the plant located in Roberts, in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho).

This permit is based on your permit application received on June 11, 2009. This permit is effective immediately and replaces PTC No. P-2009.0013, issued March 30, 2009, the terms and conditions of which no longer apply. This permit does not release Crop Production Services, Inc. from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Pursuant to General Provision 5 of your permit, it is required that Construction and Operation Notification be provided. Please provide this information as listed to DEQ's Idaho Falls Regional Office, 900 N. Skyline, Suite B, Idaho Falls, ID 83402, Fax (208) 528-2695.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Maria Miles, Air Quality Analyst, at (208) 528-2650 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends 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 Morrie Lewis at (208) 373-0502 or Morrie.Lewis@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Simon". The signature is fluid and cursive, with a large initial "M" and a long, sweeping underline.

Mike Simon
Stationary Source Program Manager
Air Quality Division

MSML:hp

Project No. P-2009.0087

Enclosure



**Air Quality
PERMIT TO CONSTRUCT
State of Idaho
Department of Environmental Quality**

PERMIT No.: P-2009.0087
FACILITY ID No.: 051-00020
AQCR: 61 **CLASS:** SM **ZONE:** 12
SIC: 2874 **NAICS:** 325312
UTM COORDINATE (km): 411.7, 4835.2

1. PERMITTEE

Crop Production Services, Incorporated

2. PROJECT

Permit to construct – revision for a boiler replacement project

3. MAILING ADDRESS

272 North Bassett Road

CITY

Roberts

STATE

ID

ZIP

83444-5246

4. FACILITY CONTACT

Scott Clelland

TITLE

Manager, Operations Compliance

TELEPHONE

(208) 737-1007 or (208) 308-2815

5. RESPONSIBLE OFFICIAL

Scott Clelland

TITLE

Manager, Operations Compliance

TELEPHONE

(208) 737-1007 or (208) 308-2815

6. EXACT PLANT LOCATION

272 North Bassett Road, Roberts, Idaho

COUNTY

Jefferson

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Agricultural retail services and fertilizer manufacturing

8. PERMIT AUTHORITY

This permit is issued according to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200 through 228, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed or modified by this permit.

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

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

This permit has been granted on the basis of design information presented with its application. Changes 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

MORRIE LEWIS, PERMIT WRITER
DEPARTMENT OF ENVIRONMENTAL QUALITY

Mike Simon

MIKE SIMON, STATIONARY SOURCE PROGRAM MANAGER
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE MODIFIED/REVISED:	September 15, 2009
DATE ISSUED:	February 28, 2006

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Acronyms, Units, and Chemical Nomenclature

AQCR	Air Quality Control Region
CPS	Crop Production Services, Inc.
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
gr	grains (1 lb = 7,000 grains)
hp	horsepower
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometers
MMBtu/hr	million British thermal units per hour
NAICS	North American Industry Classification System
O&M	operations and maintenance
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
SIC	Standard Industrial Classification
SM	synthetic minor
UTM	Universal Transverse Mercator

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1. PERMIT TO CONSTRUCT SCOPE

Purpose

- 1.1 The purpose of this permit to construct (PTC) is for the installation and operation of a replacement boiler.
- 1.2 Those permit conditions that have been modified or revised by this permitting action are identified by a date citation located directly under the permit condition and on the right hand margin.
- 1.3 This PTC replaces Permit to Construct No. P-2009.0013, issued on March 30, 2009, the terms and conditions of which shall no longer apply.

Regulated Sources

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

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Section	Source Description	Emissions Controls
2	Reactor No.1 (10-34-0 reactor)	The wet scrubber (a packed bed) and the stainless-steel demister pads are part of the reactor design. While recovering the product and reducing the temperature, they also reduce the emissions.
3	<u>Boiler No.1</u> Manufacturer: Sellers Model: 77 Commodore / C-100-W Construction date: 10/15/06 Maximum capacity: 4.184 MMBtu/hr or 100 hp Fuel: propane	None

[September 15, 2009]

2. REACTOR NO.1 (10-34-0 REACTOR)

2.1 Process Description

The 10-34-0 reactor was custom made by Unocal in 1985. It replaced the facility's existing reactor. Superphosphoric acid (SPA), ammonia, and water are fed to the reactor at the rates of 1,500, 1,080, and 2,100 gallons per hour, respectively. 10-34-0 ammonium polyphosphate liquid fertilizer is generated at the rate of 2,800 gallons per hour.

2.2 Emissions Control Description

A wet scrubber (a packed bed) and stainless-steel demister pads are integral components of the reactor design. Their primary design function is to optimize the recovery of the liquid fertilizer. As the wet scrubber and the demister pads recover the liquid fertilizer, they also reduce the temperature of the liquid fertilizer and control air pollutant emissions exiting the reactor stack. A reduction in the post-reaction vapor temperature provides for condensation of liquid fertilizer to optimize fertilizer recovery in the off-gas stream.

Table 2.1 REACTOR NO.1 DESCRIPTION

Emissions Unit / Process	Emissions Control Device	Emissions Point
Reactor No.1 (10-34-0 reactor)	The wet scrubber (a packed bed) and the stainless-steel demister pads	Annular space at the top of the reactor with outer diameter of 10 feet and an inner diameter of 4 feet

Emissions Limits

2.3 Emissions Limits

The PM₁₀ emissions from the reactor stack shall not exceed 1.9 tons per any consecutive 12-month period.

2.4 Opacity Limit

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

2.5 Annual Operating Hours Limit

The permittee shall not operate the reactor more than 1,440 hours per any consecutive 12-month period. For the purposes of this permit, operate shall mean when liquid fertilizer is being produced or generated in the reactor.

2.6 Operations and Maintenance Manual Requirements

The permittee shall maintain and implement an (O&M) manual for the wet scrubber (a packed bed) and the stainless-steel demister pads using the manufacturer's specifications, operational experience, and information from source tests. The O&M manual shall describe the procedures that will be followed to comply with General Provision 2. The O&M manual shall contain at a minimum, the following information: a general description of the reactor, wet scrubber (a packed bed), and stainless-steel demister pads; a general discussion of the operation of the reactor; normal operating procedures; normal operating ranges; corrective action procedures when the reactor operates outside the normal operating

ranges; and maintenance procedures and maintenance frequency. The O&M manual shall remain on site at all times and shall be made available to DEQ representatives upon request.

2.7 Reactor Operations

The permittee shall operate the reactor in accordance with the O&M manual.

Monitoring and Recordkeeping Requirements

2.8 Operating Hour Monitoring

The permittee shall monitor and record the number of hours the reactor operates monthly. The annual hours of operation shall be determined by summing each monthly hours of operation over the previous consecutive 12-month period to demonstrate compliance with Permit Condition 2.5. Records of this information shall be maintained on site and in accordance with General Provision 7 of this permit.

3. BOILER NO. 1

3.1 Process Description

The boiler is used during the production of the 10-34-0 ammonium polyphosphate liquid fertilizer and for other heating purposes at the facility.

[September 15, 2009]

3.2 Emissions Control Description

The emissions from the boiler are uncontrolled.

Table 3.1 BOILER NO. 1 DESCRIPTION

Emissions Unit / Process	Emissions Control Device	Emissions Point
Boiler No. 1	None	Boiler stack

Emissions Limits

3.3 Opacity Limit

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

3.4 Grain Loading Standard

The permittee shall not discharge PM to the atmosphere from any fuel-burning equipment in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas.

Operating Requirements

3.5 Fuel Type

The boiler shall be fired by propane, exclusively.

4. PERMIT TO CONSTRUCT 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 58.01.01.211, 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 58.01.01.212.01, 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 in accordance with IDAPA 58.01.01.211:
 - 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 58.01.01.211, 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 58.01.01.211, 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]

Transferability

12. 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

13. 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 58.01.01.322.15.h, 5/1/94; 40 CFR 70.6(a)(5)]