

November 16, 2001

**MEMORANDUM**

TO: Daniel P. Salgado  
New Source Review Coordinator

THROUGH: Zach Q. Klotovich, E.I.T. *ZQK*  
State Office of Technical Services

SUBJECT: *PERMIT TO CONSTRUCT TECHNICAL ANALYSIS*  
P-010312, J.R. Simplot Co., Don Plant, Pocatello, Idaho  
(Don Plant Granulation III Plant Upgrade, PTC Number 077-00006)

**PURPOSE**

The purpose of this memorandum is to explain the amendments made to the Granulation III Plant permit.

**SUMMARY OF EVENTS**

A final permit for the Granulation III Plant modification was issued to J.R. Simplot Co. on October 16, 2001. On October 31, 2001, J.R. Simplot Co. submitted proposed language changes and requested a discussion about the permit. On November 6, 2001, DEQ met with J.R. Simplot representatives, Leon Pruett and Bob Willey, and discussed the proposed permit language amendments. On November 9, 2001, DEQ received a request to issue a draft permit so that J.R. Simplot Co. could review the amended language prior to DEQ issuing another final permit.

**DISCUSSION**

The following permit conditions were discussed and amended language is denoted.

2.4 Fuel Type

The dryer, with a maximum rated heat input capacity of 35 million Btus per hour (determined on a 24-hour rolling average) shall be fueled on natural gas exclusively.

(J.R. Simplot Co. believes fuel consumption may occasionally peak above 35 million Btus per hour. J.R. Simplot Co. and DEQ agreed to add the word "rated" and base the determination on a 24-hour rolling average, to point out that it is possible to put more than 35 million Btus per hour into the dryer. However, the permit application and permit limits are based on a maximum natural gas input of 35 million Btus per hour, so the dryer should not be operated above that.)

2.6 Fugitive Emission Inspection

The permittee shall conduct a weekly Granulation III plant-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.

(Granulation III was added to clarify that the inspection is to be done on only the Granulation III plant, not the entire Don plant.)

## 2.7 Air Stagnation Advisory Days

~~The Granulation III plant shall not be operated during Air Stagnation Advisory days.~~

The permittee shall comply with the Air Pollution Emergency Rules in IDAPA 58.01.01.550 through 562.

(The language in Permit Condition 2.7 was changed to clarify that J.R. Simplot Co. must follow the Air Pollution Emergency Rules. The previous language may have been interpreted to mean the plant could not be operated at any stage of an air stagnation advisory.)

### 3.1.2 The pressure drop across the baghouse shall be monitored and recorded during each performance test.

(The permit language was not changed. However, DEQ wants to clarify here that the pressure drop is required to be recorded during source testing to ensure it is within the range specified by the O&M Manual. The source test is not intended to be used to set a new allowable pressure drop range.)

### 3.1.3 The pressure drop and liquid flow rate of the wet scrubber shall be monitored and recorded during each performance test.

(The permit language was not changed. However, DEQ wants to clarify here that the pressure drop and flow rate are required to be recorded during source testing to ensure they are within the range specified by the O&M Manual. The source test is not intended to be used to set a new allowable pressure drop range or liquid flow rate.)

### 3.4.3 The rolling 24-hour average heat input of natural gas to the dryer in million Btus per hour.

This section was added to the permit to require monitoring to demonstrate compliance with Permit Condition 2.4.

## 3.5 Fugitive Emissions

A compilation of the most recent two years of records shall be kept onsite and shall be made available to Department representatives upon request.

### 3.5.1 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, baghouse, etc.) to reasonably control fugitive emissions at the Granulation III plant.

### 3.5.2 The permittee shall maintain records of the results of each weekly fugitive emissions inspection. The records shall, at a minimum, include 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.

(J.R. Simplot Co. requested that Permit Condition 2.6 and 3.5 be removed from the permit. The permit conditions remain in the permit because they are needed to ensure compliance with Permit Condition 1.2. The permit conditions were amended to clarify that the fugitive emission inspection applies to only the Granulation III plant and to clarify that emissions can be controlled by a baghouse).

4.5 Operation and Maintenance Manual

The permittee shall submit the O&M manual for the baghouse and scrubber, required in Permit Condition 3.3, for Department approval within 60 days of startup.

(J.R. Simplot Co. asked that Permit Condition 4.5 be clarified to identify that the O&M Manual is for the baghouse and scrubber.)

RECOMMENDATION

DEQ staff recommend that the J.R. Simplot Co. be issued a draft amended PTC Number 077-00006 for the Granulation III plant. No public comment period is recommended, no entity has requested a comment period, and the project does not involve Prevention of Significant Deterioration requirements.

ZK:tk

G:\AHW\KLOTOVIC\PROGRAM OFFICE\SIMPLOT\FINAL PERMIT\P-010312 TECH MEMO.DOC