

December 3, 1999

**MEMORANDUM**

**TO:** Orville D. Green, Administrator  
State Air Quality Program

**FROM:** Daniel Salgado, Lead   
Process Engineering  
Technical Services Office

**SUBJECT:** J.R. Simplot Co., Don Siding Facility, Pocatello  
(Operating Permit Amendment #077-00006)

**PROJECT DESCRIPTION**

The J.R. Simplot Company, DON Siding facility (Simplot) utilizes continuous emissions monitoring systems (CEMS) to measure SO<sub>2</sub> emissions from the #300 and #400 Sulfuric Acid Plants, and NO<sub>x</sub> from the Nitric Acid Plant. The CEMS' requirements were originally placed in the permit prior to promulgation of the requirements of 40 CFR 60, Appendix F, Quality Assurance Procedures. Simplot conducted an initial CEMS calibration when the CEMS were first installed on the #300 and #400 Sulfuric Acid Plants and the Nitric Acid plant. Since that time, Simplot has not done RATAs or CGAs to determine the accuracy of their CEMS.

On July 13, 1999, the Idaho Division of Environmental Quality (DEQ) issued an amended Tier II operating permit to Simplot clarifying DEQ's belief that the quality assurance (QA) procedures of 40 CFR 60 Appendix F apply to the CEMS. Simplot appealed the permit, arguing that the requirements of Appendix F do not apply to the CEMS, because they are not used for compliance purposes. Because the Appendix F requirements will be placed in Simplot's Tier I operating permit along with an emissions bubble, Simplot and DEQ representatives agreed that, in lieu of performing the QA procedures in Appendix F, Simplot would measure and record zero and span values daily and conduct cylinder gas audits quarterly until the Tier I operating permit is issued.

**DISCUSSION**

On March 1, 1999, DEQ requested information pertaining to quality assurance procedures for the CEMS on Simplot's Nitric Acid Plant and the #300 and #400 Sulfuric Acid Plants. The request specifically referenced Relative Accuracy Test Audit (RATA) reports and Cylinder Gas Audit (CGA) reports. On March 19, 1999, DEQ received a response from Simplot stating that the RATAs and CGAs are not required under the operating permit, and questioning the need to submit the requested information. On March 22, 1999, DEQ restated it's request and explained the reason for the request. On April 9, 1999, DEQ received Simplot's response which states that the CEMS are not used for compliance demonstrations and, therefore, RATAs are not required. DEQ again requested information on April 21, 1999, regarding 24-hour zero and span drift calibrations for each of the CEMS, as well as other raw data. On April 28, 1999, Simplot requested an extension in time to submit the information requested in DEQ's April 21, 1999 letter. On May 10, 1999, representatives from DEQ and Simplot met, via conference call, to discuss the reason for the data, and DEQ's interpretation that 40 CFR 60 Subpart F requirements apply to the CEMS. At that meeting, DEQ informed Simplot that the permit would be amended to clarify the requirements. On May 12, 1999,

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DEQ granted Simplot a fifteen (15) day extension to submit the requested information. On July 13, 1999, DEQ issued an amended Tier II operating permit to Simplot. On August 17, 1999, Simplot filed an appeal. In late August, DEQ and Simplot met to discuss Simplot's concerns and how they could be addressed to satisfy both Simplot and DEQ. Both parties agreed to amend the permit to remove the Appendix F requirements, but to include daily zero and span checks and quarterly CGA's.

### **FEES**

This facility is a major facility as defined by IDAPA 16.01.01.008.14 (*Rules for the Control of Air Pollution in Idaho*); therefore, registration and registration fees, in accordance with IDAPA 16.01.01.527, are applicable. This amendment will not change the required fee payment.

### **RECOMMENDATIONS**

Based on review of application materials and all applicable state and federal rules and regulations, staff recommends that the J.R. Simplot company be issued an amended Tier II Operating Permit #077-00006 for the Don Siding facility. No public comment period is recommended, the stringency of emission limits and monitoring requirements have not been lessened, and no entity has requested a comment period.

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cc: D. Salgado, TSO  
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Database SO/Source File (077-00006)  
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December 3, 1999

**MEMORANDUM**

**TO:** Orville D. Green  
Administrator  
State Air Quality Program

**FROM:** Daniel P. Salgado   
Lead Process Engineering  
State Technical Services Office

**SUBJECT:** **TIER II OPERATING PERMIT TECHNICAL ANALYSIS**  
J.R. Simplot Co., Don Siding Facility, Pocatello  
(Operating Permit Amendment)

**PURPOSE**

The purpose of this memorandum is to satisfy the requirements of IDAPA 16.01.01.400 (*Rules for the Control of Air Pollution in Idaho*) for issuing Tier II Operating Permits (OP).

**PROJECT DESCRIPTION**

The J.R. Simplot Company, DON Siding facility (Simplot) utilizes continuous emissions monitoring systems (CEMS) to measure SO<sub>2</sub> emissions from the #300 and #400 Sulfuric Acid Plants, and NO<sub>x</sub> from the Nitric Acid Plant. The CEMS' requirements were originally placed in the permit prior to promulgation of the requirements of 40 CFR 60, Appendix F, Quality Assurance Procedures. Simplot conducted an initial CEMS calibration when the CEMS were first installed on the #300 and #400 Sulfuric Acid Plants and the Nitric Acid plant. Since that time, Simplot has not done RATAs or CGAs to determine the accuracy of their CEMS.

On July 13, 1999, the Idaho Division of Environmental Quality (DEQ) issued an amended Tier II operating permit to Simplot clarifying DEQ's belief that the quality assurance (QA) procedures of 40 CFR 60 Appendix F apply to the CEMS. Simplot appealed the permit, arguing that the requirements of Appendix F do not apply to the CEMS, because they are not used for compliance purposes. Because the Appendix F requirements will be placed in Simplot's Tier I operating permit along with an emissions bubble, Simplot and DEQ representatives agreed that, in lieu of performing the QA procedures in Appendix F, Simplot would measure and record zero and span values daily and conduct cylinder gas audits quarterly until the Tier I operating permit is issued.

**SUMMARY OF EVENTS**

On March 1, 1999, DEQ requested information pertaining to quality assurance procedures for the CEMS on Simplot's Nitric Acid Plant and the #300 and #400 Sulfuric Acid Plants. The request specifically referenced Relative Accuracy Test Audit (RATA) reports and Cylinder Gas Audit (CGA) reports. On March 19, 1999, DEQ received a response from Simplot stating that the RATAs and CGAs are not required under the operating permit, and questioning the need to submit the requested information. On March 22, 1999, DEQ restated it's request and explained the reason for the request. On April 9, 1999, DEQ received Simplot's response which states that the CEMS are not used for compliance demonstrations and, therefore, RATAs are not required. DEQ again requested information on April 21, 1999, regarding 24-hour zero and span drift calibrations for each of the CEMS, as well as other raw data. On April 28, 1999, Simplot requested an extension in time to submit the information requested in DEQ's April 21, 1999 letter. On May 10, 1999, representatives from DEQ and Simplot met, via conference call, to discuss the reason for the data and DEQ's interpretation that 40 CFR 60 Subpart F requirements apply to the CEMS. At that meeting, DEQ informed Simplot that the permit would be amended to clarify the requirements. On May 12, 1999, DEQ granted Simplot a fifteen (15) day extension to submit the requested information. On July 13, 1999, DEQ issued an amended Tier II

operating permit to Simplot. On August 17, 1999, Simplot filed an appeal. In late August, DEQ and Simplot met to discuss Simplot's concerns and how they could be addressed to satisfy both Simplot and DEQ. Both parties agreed to amend the permit to remove the Appendix F requirements, but to include daily zero and span checks and quarterly CGA's.

## DISCUSSION

### 1. Area Classification

J.R. Simplot's Don Siding facility is located in Pocatello, Idaho. Pocatello is located in the Power/Bannock County PM-10 nonattainment area. The area is designated as an attainment or unclassifiable area for all other regulated criteria air pollutants.

### 2. Facility Classification

This facility is a major facility as defined by IDAPA 16.01.01.006.54. The facility is a designated facility as defined by IDAPA 16.01.01.006.25. The facility is subject to federal regulation in accordance with 40 CFR 60 Subpart T, 40 CFR 60 Subpart U, 40 CFR 60 Subpart G, and 40 CFR 60 Subpart H. The SIC code defining the facility is 2874, and the facility is classified as A1. The facility is located in AQCR 61 and Zone 12.

### 3. Regulatory Review

The Department is amending the existing Tier II Operating Permit. The amendment does not change the regulatory status of the facility. The following sections of the permit were changed as follows.

#### Nitric Acid and Nitrogen Solutions Plant and Associated Handling

- 3.2 The Permittee shall install, calibrate, maintain, and operate a Continuous Emission Monitoring System for the measurement of nitrogen oxides, as required in 40 CFR 60.73. ~~The accuracy of the monitoring results shall be in accordance with 40 CFR 60 Appendix F. The Permittee shall measure and record zero and span values daily and conduct cylinder gas audits quarterly. The results of the zero and span measurements and the quarterly gas audits shall be kept on site for a minimum of two (2) years and made available to Department representatives upon request.~~

#### 4. REPORTING REQUIREMENTS

Nitrogen oxides continuous emission monitoring data ~~and the cylinder gas audit results~~ shall be submitted to DEQ in a calendar-quarterly report. The calendar-quarterly report shall be received by DEQ no later than thirty (30) days after each calendar quarter.

#### #300 Sulfuric Acid Plant and Associated Handling

- 4.2 The Permittee shall install, calibrate, maintain, and operate a Continuous Emission Monitoring System for the measurement of sulfur dioxide, as described in 40 CFR 60.84 and 40 CFR 60.13. The accuracy of the monitoring results shall be in accordance with 40 CFR 60 Appendix B - Performance Specification 2, ~~and 40 CFR 60 Appendix F. The Permittee shall measure and record zero and span values daily and conduct cylinder gas audits quarterly. The results of the zero and span measurements and the quarterly gas audits shall be kept on site for a minimum of two (2) years and made available to Department representatives upon request.~~

- 5.1 ~~The results of all emission tests, visible emission data and cylinder gas audits on the continuous emissions monitors shall be reported to DEQ in the calendar-quarterly report. The calendar-quarterly report shall be received by DEQ no later than thirty (30) days after each calendar quarter. Continuous emission monitoring data and the~~

production rates, determined during the tests, shall be reported to DEQ with the emission test data.

#### #400 Sulfuric Acid Plant and Associated Handling

- 4.2 The Permittee shall install, calibrate, maintain, and operate a Continuous Emission Monitoring System for the measurement of sulfur dioxide, as described in 40 CFR 60.84 and 40 CFR 60.13. The accuracy of the monitoring results shall be in accordance with 40 CFR 60 Appendix B - Performance Specification 2, and 40 CFR 60 Appendix F. The Permittee shall measure and record zero and span values daily and conduct cylinder gas audits quarterly. The results of the zero and span measurements and the quarterly gas audits shall be kept on site for a minimum of two (2) years and made available to Department representatives upon request.
- 5.1 The results of all emission tests, visible emission data, and cylinder gas audits on the continuous emission monitors shall be reported to DEQ in the calendar-quarterly report. The calendar-quarterly report shall be received by DEQ no later than thirty (30) days after each calendar quarter. Continuous emission monitoring data and the production rates, determined during the tests, shall be reported to DEQ with the emission test data.

#### 4. Emission Estimates

No allowable emissions limit is changing.

#### 5. Modeling

Because the allowable emissions limits are not changing, modeling is not required.

#### 6. Interbureau Coordination

This document will be routed internally for Title V Operating Permit applicability.

#### 7. AIRS

Because this is a clarification to the permit, no AIRS update is necessary.

#### 9. Fees

This facility is a major facility as defined by IDAPA 16.01.01.008.14; therefore, registration and registration fees, in accordance with IDAPA 16.01.01.527, are applicable. This amendment will not change the required fee payment.

### RECOMMENDATION

Based on review of application materials and all applicable state and federal rules and regulations, staff recommend that the J.R. Simplot company be issued an amended Tier II Operating Permit #077-00006 for the Don Siding facility. No public comment period is recommended, the stringency of emission limits and monitoring requirements have not been lessened, and no entity has requested a comment period.

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