



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502
www.deq.idaho.gov

C.L. "Butch" Otter, Governor
John H. Tippets, Director

September 17, 2015

Paul Pierce, Site Manager
BASF Corporation
818 Paynter Ave.
Caldwell, ID 83605

RE: Facility ID No. 027-00088, BASF Corporation, Caldwell
Final Permit Letter

Dear Mr. Pierce:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2013.0053 Project 61547 to BASF Corporation located at Caldwell for control equipment changes. 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 June 30, 2015.

This permit is effective immediately and replaces PTC No. P-2013.0053, issued on November 27, 2013. This permit does not release BASF Corporation from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Pursuant to the Construction and Operation Notification General Provision of your permit, it is required that construction and operation notification be provided. Please provide this information as listed to DEQ's Boise Regional Office, 1445 N. Orchard, Boise, ID 83706, Fax (208) 373-0287.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Tom Krinke, Air Quality Compliance Officer, at (208) 373-0419 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 Kelli Wetzel at (208) 373-0502 or kelli.wetzel@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".

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS\KW

Permit No. P-2013.0053 PROJ 61547

Air Quality

PERMIT TO CONSTRUCT

Permittee BASF Corp.
Permit Number P-2013.0053
Project ID 61547
Facility ID 027-00088
Facility Location 818 Paynter Avenue
Caldwell, ID 83605

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 the 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; and (g) in no manner implies or suggests that the Idaho 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 September 17, 2015


Kelli Wetzel, Permit Writer



Mike Simon, Stationary Source Manager

Contents

1	Permit Scope.....	3
2	Line 1 and Line 2 Limestone Storage Silos.....	5
3	Product Line 1 and Product Line 2.....	7
4	General Provisions.....	10

1 Permit Scope

Purpose

- 1.1 This is a revised permit to construct (PTC) to replace existing control equipment to improve collection efficiency and decrease overall PM emissions.

[September 17, 2015]

- 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 on the right-hand margin.

- 1.3 This PTC replaces Permit to Construct No. P-2013.0053, issued on November 27, 2013.

[September 17, 2015]

Regulated Sources

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

Table 1.1 Regulated Sources

Permit Section		Source	Control Equipment
2, 3	Line 1	<u>Limestone Storage Silo:</u> 50 ton capacity	<u>Dust Collector No. 1-1:</u> Manufacturer: Donaldson Torit Model: CPC-3 Three powercore with Ultra Web filter packs PM ₁₀ control efficiency: 99.9%
3		<u>Mixer:</u> CentriCoater Model CC250 550 pound batch capacity	<u>Dust Collector No. 1-2:</u> Manufacturer: Donaldson Torit Model: DFO 4-112 112 Ultra-Web MERV 15 rated cartridge filters PM ₁₀ control efficiency: 99.9%
3		<u>Drying Deck:</u> Oliver Machine 5 MMBtu/hr natural gas heater	
3		<u>Cooling Deck:</u> Oliver Machine	
3		PVOH Processing	<u>Dust Collector No. 1-3:</u> Manufacturer: Spiroflow Systems Model: DSE-3 Two cartridge filters, polyester media with PTFE membrane PM ₁₀ control efficiency: 99%
2, 3	Line 2	<u>Limestone Storage Silo:</u> 50 ton capacity	<u>Dust Collector No. 2-1:</u> Manufacturer: Donaldson Torit Model: CPC-3 Three powercore with Ultra Web filter packs PM ₁₀ control efficiency: 99.9%
3		<u>Mixer:</u> CentriCoater Model CC250 550 pound batch capacity	<u>Dust Collector No. 2-2:</u> Manufacturer: Donaldson Torit Model: DFO 4-112 112 Ultra-Web MERV 15 rated cartridge filters PM ₁₀ control efficiency: 99.9%
3		<u>Drying Deck:</u> Oliver Machine 5 MMBtu/hr natural gas heater	
3		<u>Cooling Deck:</u> Oliver Machine	
3		PVOH Processing	<u>Dust Collector No. 2-3:</u> Manufacturer: Spiroflow Systems Model: DSE-3 Two cartridge filters, polyester media with PTFE membrane PM ₁₀ control efficiency: 99%

[September 17, 2015]

2 Line 1 and Line 2 Limestone Storage Silos

2.1 Process Description

The Line 1 and Line 2 limestone storage silos store limestone needed for seed coating. Limestone is pneumatically transferred from a delivery truck to each silo. PM emissions are generated during silo filling. PM emissions controls are shown in Table 2.1.

2.2 Control Device Descriptions

Table 2.1 Limestone Storage Silos Description

Emissions Units / Processes	Control Devices	Emission Points
Line 1 limestone silo	Dust Collector No. 1-1	Dust Collector No. 1-1 stack
Line 2 limestone silo	Dust Collector No. 2-1	Dust Collector No. 2-1 stack

[September 17, 2015]

Emission Limits

2.3 Emission Limits

The PM₁₀ emissions from the Line 1 and Line 2 emission control device stacks shall not exceed any corresponding emissions rate limits listed in Table 2.2.

Table 2.2 Limestone Storage Silos Emission Limits

Source Description		PM ₁₀	
		lb/hr	T/yr
Line 1	Dust Collector 1-1	1.15	0.4
Line 2	Dust Collector 2-1	0.76	0.1

[September 17, 2015]

2.4 Opacity Limit

Emissions from the emissions control stack, or any other stack, vent, or functionally equivalent opening associated with the limestone storage silos, 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 Throughput Limits

Line 1 Limestone Storage Silo

The maximum annual loading rate shall not exceed 18,250 tons per year.

Line 2 Limestone Storage Silo

The maximum annual loading rate shall not exceed 18,250 tons per year.

Monitoring and Recordkeeping Requirements

2.6 Throughput Monitoring

The permittee shall monitor and record the limestone throughput for the Line 1 and the Line 2 limestone storage silos monthly and annually to demonstrate compliance with Permit Condition 2.5. Annual throughput shall be determined by summing each monthly throughput over the previous consecutive 12-month period. Records of this information shall remain onsite for the most recent two-year period and shall be made available to DEQ representatives upon request.

3 Product Line 1 and Product Line 2

3.1 Process Description

Raw seeds, a fungicide, adhesive polymers, water, dyes/colorants, peat inoculant, and limestone are combined in mix tanks to treat the seeds. Treated seeds are then transferred to the drying deck to remove moisture. Dried seeds are transferred to a cooling deck, and then bagged for storage/shipping.

3.2 Control Device Descriptions

Table 3.1 Product Lines 1 and 2 Description

Emissions Units / Processes		Control Devices	Emission Points
Line 1	“Centricoater” seed mixer	Dust collector No. 1-2	Dust collector No. 1-2 stack
	Drying deck		
	Cooling deck	Dust collector No. 1-3	Dust collector No. 1-3 stack
	PVOH processing		
Line 2	Seed mixer	Dust collector No. 2-2	Dust collector No. 2-2 stack
	Drying deck		
	Cooling deck		
	PVOH processing	Dust collector No. 2-3	Dust collector No. 2-3 stack

[September 17, 2015]

Emission Limits

3.3 Emission Limits

The PM and PM₁₀ emissions from the Line 1 and Line 2 emission control device stacks shall not exceed any corresponding emissions rate limits listed in Table 3.2.

Table 3.2 Product Lines 1 and 2 Emission Limits

Source Description		PM ₁₀	
		lb/hr	T/yr
Line 1	Dust Collector 1-2 plus Dust Collector 1-3	0.78	3.4
Line 2	Dust Collector 2-2 plus Dust Collector 2-3	0.74	3.3

[September 17, 2015]

3.4 Opacity Limit

Emissions from the emission control device stack, or any other stack, vent, or functionally equivalent opening associated with the product lines, 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

3.5 Throughput Limits

Line 1

Product throughput is limited to six tons per hour and 52, 560 tons per year.

Line 2

Product throughput is limited to six tons per hour and 52, 560 tons per year.

3.6 Pressure Drop Monitoring Devices

The permittee shall calibrate, operate, and maintain a device to continuously measure the pressure drop across the Dust Collector Nos. 1-1, 1-2, 1-3, 2-1, 2-2, and 2-3.

[September 17, 2015]

3.7 Pressure Drop

The pressure drop across Dust Collector No.s 1-1, 1-2, 1-3, 2-1, 2-2, and 2-3 shall be maintained within manufacturer and O&M manual specifications. Documentation of the operating pressure drop specification for each dust collector shall remain onsite at all times and shall be made available to DEQ representatives upon request.

[September 17, 2015]

3.8 Dust Collector No. 2-2 Stack Height

Dust Collector 2-2 stack shall be a minimum height of 30 feet with a diameter of 28.0 inches. The stack shall be vertical with no obstructions.

[September 17, 2015]

3.9 Dust Collector Filters

The dust collector filters, or equivalent, shall have a minimum control efficiency of 99% for PM₁₀.

[September 17, 2015]

Monitoring and Recordkeeping Requirements

3.10 Visible Emissions Monitoring

The permittee shall observe the visible emissions from each dust collector stack once per month when the associated process lines are operating, silos are filling, or a combination of production line operations plus silo filling. The visible emissions observations shall consist of a see/no see evaluation of each stack. If any visible emissions are present, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the test methods and procedure contained in IDAPA 58.01.01.625. The permittee shall maintain records of each visible emissions observation and each opacity test when conducted. The records shall include, at a minimum, the date and results of each observation and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

[September 17, 2015]

3.11 Throughput Monitoring

The permittee shall monitor and record the production for Line 1 and Line 2 monthly and annually to demonstrate compliance with Permit Condition 3.5. Annual throughput shall be determined by summing each monthly throughput over the previous consecutive 12-month period. Records of this information shall remain onsite for the most recent two-year period and shall be made available to DEQ representatives upon request.

3.12 Pressure Drop Monitoring

The permittee shall monitor and record the pressure drop across each dust collector once per week when the associated process lines are operating, silos are being filled, or a combination of production line operations plus silo filling. The pressure drop records shall remain onsite for the most recent two year period and shall be made available to DEQ representatives upon request.

[September 17, 2015]

3.13 Operation and Maintenance Manual Requirements

The permittee shall have O&M manuals for the each dust collector which describe the procedures that will be followed to comply with General Provision 4.2 and the manufacturer specifications for the air pollution control devices. This manual shall remain onsite at all times and shall be made available to DEQ representative upon request.

[September 17, 2015]

4 General Provisions

General Compliance

4.1 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, 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.]

4.2 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]

4.3 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

4.4 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, 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

4.5 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]

4.6 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

- 4.7 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.
- 4.8 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.
- 4.9 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 and 4/11/15]

Monitoring and Recordkeeping

- 4.10 The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Monitoring records 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, 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

- 4.11 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130–136 for excess emissions due to start-up, shut-down, scheduled maintenance, safety measures, upsets, and breakdowns.

[IDAPA 58.01.01.130–136, 4/5/00]

Certification

- 4.12 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

- 4.13 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

- 4.14 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

- 4.15 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

- 4.16 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]