



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 NORTH HILTON • BOISE, IDAHO 83706 • (208) 373-0502

JAMES E. RISCH, GOVERNOR
TONI HARDESTY, DIRECTOR

August 22, 2006

Certified Mail No. 7005 1160 0000 1550 6681

Leon Pruett
J. R. Simplot Company
P. O. Box 912
Pocatello, ID 83204

RE: Facility ID No. 077-00006, J.R. Simplot Company, Pocatello Facility
Emission Reduction Credits Certificate of Ownership

Dear Mr. Pruett:

The Idaho Department of Environmental Quality (DEQ) has processed your November 12, 2003, request for Emissions Reduction Credits (ERC) in accordance with IDAPA 58.01.01.460 and 461 (Rules for the Control of Air Pollution in Idaho)(Rules). DEQ cannot grant the full amount of ERCs requested, 263.46 tons of nitrogen oxides (NO_x) and 187.8 tons of ammonia, because 0.08 tons of NO_x and 183 tons of ammonia are from the shut-down of the nitric acid plant. The reductions in emissions from the nitric acid plant occurred more than one year before a request to bank those emissions was received by DEQ. In accordance with IDAPA 58.01.01.461, an application to bank an emission reduction credit must be received by the Department no later than one year after the reduction occurs. Consequently, DEQ can only grant an ERC equal to 263.38 tons of NO_x and 4.8 tons of ammonia.

Otherwise, DEQ has determined your request has fulfilled the requirements to bank the requested ERCs. The following table lists the ERCs that are banked and serves as J.R. Simplot Company's Certificate of Ownership.

EMISSION REDUCTION CREDITS							
PM T/yr	PM ₁₀ T/yr	NO _x T/yr	SO ₂ T/yr	VOC T/yr	CO T/yr	Methanol T/yr	NH ₃ T/yr
7.317	7.317	263.38	0.3	5.296	105.4	0.315	4.8

Any use of banked ERCs shall be in accordance with the Rules, including demonstrating compliance with the National Ambient Air Quality Standards (NAAQS) and addressing any limitations which may result from a Best Available Retrofit Technology (BART) determination.

Be advised that if J. R. Simplot Company intends to re-construct and operate the ammonia plant in the future, a permit to construct will be required prior to construction. A future modification of the J. R. Simplot Company's Tier II Operating Permit No. 077-00006, issued July 13, 1999, will specify that the ammonia plant shall not operate.

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Should you have any questions about this Certificate of Ownership for the ERCs listed above, please contact Mike Simon at (208)373-0500 or michael.simon@deq.idaho.gov.

Sincerely,



Martin Bauer, Administrator
Air Quality Division

MB/CZ/bf/sd Project No. T2-040314

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c: Pete Wagner, Pocatello Regional Office
Mike Simon, Air Quality Program Manager
Carole Zundel, Permit Writer
Marilyn Seymore\Pat Rayne, Air Quality
Permit Binder
Laurie Kral, US EPA Region 10
Reading File (Ltr Only)
~~Phyllis Heitman, (Ltr Only)~~
Source File