



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

October 15, 2018

Timothy A. Vedder III
Manager, Conda Phosphate Operations
ITAFOS Conda LLC
3010 Conda Road
Soda Springs, ID 83276

RE: Facility ID No. 029-00003, ITAFOS Conda LLC, Soda Springs
Final Permit Letter, DEQ Initiated Permit Reissuance

Dear Mr. Vedder III:

The Department of Environmental Quality (DEQ) is revising Permit to Construct (PTC) No. P-2018.0001 issued to ITAFOS Conda LLC on January 12, 2018 to correct errors that occurred in Table 1.1, Permit Conditions 2.2 and 2.4. The errors were that the B5 Boiler NOx emission limit should have been 0.20 lb/MMBtu instead of 0.079 lb/MMBtu, and that a DEQ approved alternative to the COEN low-NOx control device may be used instead of specifying that only a COEN low-NOx control device may used. These changes are made to match the August 14, 1996 amendments to the permit which were overlooked during the most recent permit action.

This permit is effective immediately and replaces PTC No. P-2018.0001, issued on January 12, 2018. This permit does not release ITAFOS Conda LLC from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances. The accompanying Statement of Basis document remains unchanged.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Melissa Gibbs, Regional Air Quality Manager, at (208) 236-6160 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 Dan Pitman at (208) 373-0502 or daniel.pitman@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 written in a cursive, flowing style.

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS/DP

Enclosure

Permit No. P-2012.0043 Project 62128

Air Quality

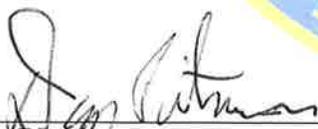
PERMIT TO CONSTRUCT

Permittee Itafos Conda LLC
Permit Number P-2018.0001
Project ID 62126
Facility ID 029-00003
Facility Location 3010 Conda Road
Soda Springs, ID 83276

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 October 15, 2018



Dan Pitman, P.E., Permit Writer



Mike Simon, Stationary Source Manager

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1 Permit Scope

Purpose

- 1.1 This permit is being revised to include emission rate limits and control device requirements to match amendments made to the permit by a DEQ letter dated August 14, 1996. These amendments were overlooked in issuing the most recent permit to construct on January 12, 2018.
- 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 revised permit replaces PTC No. P-2018.0001, issued on January 12, 2018.

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	<u>B-5 Boiler</u> Manufacturer: Nebraska Boiler Company Model: NSX-G-107-ECON Burner Model: Low NO _x burner Rated Heat Input: 213.8 MMBtu/hr Steam Capacity: 175,000 lb/hr Fuel: Natural Gas	<u>Low-NOx burner</u> Manufacturer: COEN, or Department approved equivalent

[10/15/18]

2 B-5 Boiler

2.1 Process Description

Steam for the processing of phosphate fertilizer production will be generated by a new Nebraska (B-5) gas-fired boiler, which replaces the existing B-3 boiler and the COEN auxiliary boiler.

2.2 Control Device Descriptions

The new gas-fired boiler shall be equipped with a COEN low-NO_x burner, or Department approved equivalent for the control of NO_x emissions.

[10/15/18]

Table 2.1 B-5 Boiler Description

Emissions Units / Processes	Control Devices	Emission Points
B-5 Boiler	Low NO _x burner	B-5 Boiler Exhaust

Emission Limits

2.3 Emission Limits

The emissions from the B-5 Boiler stack shall not exceed any corresponding emissions rate limits listed in Table 2.2.

Table 2.2 B-5 Boiler Emission Limits^(a)

Source Description	PM/PM ₁₀ ^(b)		SO ₂		NO _x		CO		VOC	
	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)	lb/hr ^(c)	T/yr ^(d)
B-5 Boiler	1.05	4.42	0.13	0.53	16.84	70.71	8.42	35.4	0.36	1.50

- a In absence of any other credible evidence, compliance is ensured by complying with permit operating, monitoring, and record keeping requirements.
- b Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.
- c Pounds per hour, as determined by a test method prescribed by IDAPA 58.01.01.157, EPA reference test method, continuous emission monitoring system (CEMS) data, or DEQ-approved alternative.
- d Tons per any consecutive 12-calendar month period.

2.4 NO_x Emission Limits

NO_x (oxides of nitrogen) emissions from the B-5 boiler stack shall not exceed 0.20 lb/MMBtu in accordance with 40 CFR 60.44b and the NO_x emission limits listed in Table 2.2.

[10/15/18]

2.5 Visible Emissions

Emissions from the B-5 Boiler stack, or any other stack, vent, or functionally equivalent opening associated with the B-5 Boiler stack, 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

2.6 Fuel Specifications

The B-5 boiler shall only use natural gas as fuel.

2.7 B-5 Boiler Fuel Consumption

The B-5 boiler shall not burn more than one billion seven hundred sixty-eight million standard cubic feet (1,768,000,000 scf) of natural gas fuel per year.

Monitoring and Recordkeeping Requirements

2.8 Monitoring of NO_x Emissions

As per 40 CFR 60.48b, the permittee shall monitor NO_x emissions by the use of a continuous emissions monitoring system (CEMS) as specified in Section 2.8.1 of this permit, or by the use of an EPA approved predictive emissions monitoring plan, (PEMS), as specified in Section 2.8.2 of this permit.

2.8.1 The permittee shall install, calibrate, maintain, and operate a continuous emissions monitoring system (CEMS) for measurement of NO_x emissions in compliance with 40 CFR 60.48b(b), (c), (d), (e)(2), (e)(3), and (f).

Procedures for installation, evaluation, and operation of the CEMS shall be as specified in 40 CFR 60.13.

2.8.2 The permittee shall monitor the boiler operation conditions and predict nitrogen oxides emission rates as specified in a NO_x predictive emissions monitoring plan, (PEMS), submitted to and approved by the U.S. Environmental Protection Agency (EPA) pursuant to 40 CFR 60.49b(c).

2.9 Monitoring of Operating Parameters

The permittee shall monitor and record the following data as specified in 40 CFR 60.49b (g):

- Calendar date.
- The average hourly NO_x emissions rates in lb/MMBtu and in lb/hr.
- The 30-day average NO_x emission rates calculated at the end of each operating day from measured or predicted hourly NO_x emission rates for the preceding 30 operating days.
- Identification of boiler operating days when the average 30-day NO_x emission rates exceed the standard, with an explanation of the cause of the exceedance and the corrective action taken to remedy the cause of the exceedance.
- Identification of the boiler operating days for which NO_x data have not been obtained, including the reasons for not obtaining sufficient data and a description of the correction actions taken.
- A list of the times when data were excluded from the 30-day NO_x emission average calculations because of a unit start-up, shutdown, malfunction, or other reasons.
- Applicable data as specified in 40 CFR 60.49b (g) (7), (8), (9) and (10).

2.10 Fuel Consumption Monitoring

The permittee shall monitor the cumulative volume of natural gas fuel consumption on a quarterly basis. Quarterly is defined as a three (3) month period during the calendar year.

2.11 Maintenance of Records

All records shall be kept on-site for a minimum period of two (2) years and be made available to Department representatives upon request.

Reporting Requirements

2.12 Performance Specification Test Protocol

If a NO_x CEMS will be installed, the permittee shall submit to the Department for approval, a protocol for the performance specification test procedure of the CEMS, at least thirty (30) days prior to the test date.

2.13 Performance Specification Test Report

If a CEMS is installed, the performance evaluation results of the performance specification test done on the CEMS, shall be submitted to the EPA and the Department within thirty (30) days of the date on which the test was conducted.

2.14 Predictive NO_x Emissions Monitoring Plan

If a predictive emissions monitoring plan will be used, as per 40 CFR 60.49b(c), the permittee shall submit to the EPA for approval, a predictive NO_x monitoring plan, that identifies the operating conditions or parameters to be monitored and maintained, as required in Section 4.3.2 of this permit. The plan shall be submitted to the EPA for approval within 360 days of the initial start-up and shall:

- Identify the specific operating conditions to be monitored and the relationship between these operating conditions and NO_x emission rates;
- Include data and information used to identify the relationship between the NO_x emissions and these operating conditions;
- Identify how these operating conditions will be monitored on an hourly basis, and the type and format of the records of these operating conditions and the predicted NO_x emissions.

A copy of the predictive NO_x emissions plan shall be submitted to the Department within thirty (30) days after approval by the EPA.

2.15 Report of Exceedances

- As per 40 CFR 60.49b (h), the permittee shall submit to the EPA, NO_x excess emission reports for any calendar quarter with NO_x exceedances. If no excess emissions occur during the calendar quarter, a semi-annual report shall be submitted stating that no excess NO_x emissions occurred during the semi-annual reporting period.
- Copies of the NO_x exceedance reports shall also be submitted to the Department.

2.16 Certification of Documents

All documents submitted to the Department, including reports, shall contain a certification by a responsible official per IDAPA 16.01.01.123. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

3 General Provisions

General Compliance

3.1 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.]

3.2 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]

3.3 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

3.4 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

3.5 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]

3.6 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; and
- A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211.01, 5/1/94]

- 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.

[IDAPA 58.01.01.211.03, 5/1/94]

Performance Testing

- 3.7 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.
- 3.8 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.
- 3.9 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 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

- 3.10 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

- 3.11 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

- 3.12 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

- 3.13 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

- 3.14 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

- 3.15 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

- 3.16 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]