



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502

C.L. "Butch" Otter, Governor
Toni Hardesty, Director

March 27, 2009

Certified Mail No. 7190 0596 0014 0000 5858

Scott Clelland
Manager, Operations Compliance
Crop Production Services, Inc.
473 Hankins Road South
Kimberly, ID 83341-5095

RE: Facility ID No. 027-00089, Crop Production Services, Inc., Caldwell
Final Permit Letter

Dear Mr. Clelland

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2009.0014 to Crop Production Services, Inc. (CPS) for a change in ownership of the facility located in Caldwell, in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho).

This permit is based on your permit application received on February 2, 2009. This permit is effective immediately and replaces PTC No. P-050028, issued on February 28, 2006, the terms and conditions of which no longer apply. This permit does not release CPS from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

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 Harbi Elshafei at (208) 373-0502 or harbi.elshafei@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".

Mike Simon
Stationary Source Program Manager
Air Quality Division

MSVHE/hp

Project No. P-2009.0014

Enclosure



**Air Quality
PERMIT TO CONSTRUCT
State of Idaho
Department of Environmental Quality**

PERMIT No.: P-2009.0014

FACILITY ID No.: 027-00089

AQCR: 64

CLASS: SM

ZONE: 11

SIC: 2874

NAICS: 325312

UTM COORDINATE (km): 532.0, 4834.0

1. PERMITTEE

Crop Production Services, Inc.

2. PROJECT

Revision to Permit to Construct, Change in Ownership – Caldwell Facility

3. MAILING ADDRESS

473 Hankins Road South

CITY

Kimberly

STATE

ID

ZIP

83341-5095

4. FACILITY CONTACT

Scott Clelland

TITLE

Manager, Operations Compliance

TELEPHONE

(208) 737-1007 or (208) 459-4601

5. RESPONSIBLE OFFICIAL

Scott Clelland

TITLE

Manager, Operations Compliance

TELEPHONE

(208) 737-1007 or (208) 459-4601

6. EXACT PLANT LOCATION

10257 Highway 20-26, Caldwell, Idaho

COUNTY

Canyon

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Agricultural retail services/Fertilizer manufacturing

8. PERMIT AUTHORITY

This permit is issued according to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200 through 228, and 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.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) 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; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the 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.

This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented with its application. Changes in design, equipment or operations may be considered a modification. Modifications are subject to DEQ review in accordance with IDAPA 58.01.01.200 through 228 of the Rules for the Control of Air Pollution in Idaho.

Harbi Elshafel

HARBI ELSHAFEL, PERMIT WRITER
DEPARTMENT OF ENVIRONMENTAL QUALITY

Mike Simon

MIKE SIMON, STATIONARY SOURCE PROGRAM MANAGER
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE MODIFIED/REVISED:

March 27, 2009

DATE ISSUED:

February 28, 2006

Table of Contents

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE	3
1. PERMIT TO CONSTRUCT SCOPE.....	4
2. REACTOR NO. 1 (10-34-0 REACTOR).....	5
3. PERMIT TO CONSTRUCT GENERAL PROVISIONS	7

Acronyms, Units, and Chemical Nomenclature

AQCR	Air Quality Control Region
DEQ	Department of Environmental Quality
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
NAICS	North American Industry Classification System
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
SIC	Standard Industrial Classification
SM	synthetic minor
UTM	Universal Transverse Mercator

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2009.0014

Permittee:	Crop Production Services, Inc.
Location:	Caldwell, Idaho

Facility ID No. 027-00089

1. PERMIT TO CONSTRUCT SCOPE

Purpose

- 1.1 The purpose of this permit is to change the permittee name from Western Farm Services to Crop Production Services.
- 1.2 This PTC replaces PTC No. P-050028, issued on February 28, 2006, the terms and conditions of which shall no longer apply.

Regulated Sources

- 1.3 Table 1.1 lists all sources of regulated emissions in this PTC.

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Section	Source Description	Emissions Control(s)
2	Reactor No.1 (10-34-0 reactor)	The wet scrubber (a packed bed) and the stainless-steel demister pads are part of the reactor design. While recovering the product and reducing the temperature, they also reduce the emissions.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2009.0014

Permittee:	Crop Production Services, Inc.	Facility ID No. 027-00089
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2. REACTOR NO. 1 (10-34-0 REACTOR)

2.1 Process Description

The 10-34-0 reactor was custom made by Unocal in 1985-1986. Superphosphoric acid (SPA), ammonia, and water are fed to the reactor at the rates of 1,620, 1,355, and 2,640 gallons per hour, respectively. 10-34-0 ammonium polyphosphate liquid fertilizer is generated at the rate of 4,810 gallons per hour. Emissions from the reactor are exhausted to the atmosphere through two stacks located on top of the reactor vessel above the scrubber (packed bed) and the demister pads. All emissions are uncontrolled.

2.2 Emissions Control Description

A wet scrubber (a packed bed) and stainless-steel demister pads are integral components of the reactor design. Their primary design function is to optimize the recovery of the liquid fertilizer. As the wet scrubber and the demister pads recover the liquid fertilizer, they also reduce the temperature of the liquid fertilizer and control air pollutant emissions exiting the reactor stacks. A reduction in the post-reaction vapor temperature provides for condensation of liquid fertilizer to optimize fertilizer recovery in the off-gas stream. Two identical stacks are located on top of the reactor vessel, above the scrubber and demister pads. Emissions vent to the atmosphere through these stacks.

Table 2.1 REACTOR NO.1 DESCRIPTION

Emissions Unit / Process	Emissions Control Device	Emissions Point
Reactor No.1 (10-34-0 reactor)	The wet scrubber (a packed bed) and the stainless-steel demister pads	Two identical reactor stacks

Emissions Limits

2.3 Emissions Limit

The PM₁₀ emissions from the reactor stacks shall not exceed 1.0 tons per any consecutive 12-month period.

2.4 Opacity Limit

Emissions from the reactor stacks, or any other stack, vent, or functionally equivalent opening associated with the reactor, 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 Annual Operating Hours Limits

The permittee shall not operate the reactor more than 504 hours per any consecutive 12-month period. For the purposes of this permit, operate shall mean when liquid fertilizer is being produced or generated in the reactor.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2009.0014

Permittee: Crop Production Services, Inc.

Location: Caldwell, Idaho

Facility ID No. 027-00089

2.6 Operations and Maintenance Requirements

The permittee shall maintain and implement an O&M manual for the wet scrubber (a packed bed) and the stainless-steel demister pads using the manufacturer's specifications, operational experience, and information from source tests. The O&M manual shall describe the procedures that will be followed to comply with General Provision 2. The O&M manual shall contain at a minimum, the following information: a general description of the reactor, wet scrubber (a packed bed), and stainless-steel demister pads; a general discussion of the operation of the reactor; normal operating procedures; normal operating ranges; corrective action procedures when the reactor operates outside the normal operating ranges; and maintenance procedures and maintenance frequency. The O&M manual shall remain on site at all times and shall be made available to DEQ representatives upon request.

2.7 Reactor Operations

The permittee shall operate the reactor in accordance with the O&M manual.

Monitoring and Recordkeeping Requirements

2.8 Operating Hour Monitoring

The permittee shall monitor and record the number of hours the reactor operates monthly. The annual hours of operation shall be determined by summing each monthly hours of operation over the previous consecutive 12-month period to demonstrate compliance with Permit Condition 2.5. Records of this information shall be kept on site for the most recent five-year period and shall be made available to DEQ representatives upon request.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2009.0014

Permittee:	Crop Production Services, Inc.	Facility ID No. 027-00089
Location:	Caldwell, Idaho	

3. PERMIT TO CONSTRUCT GENERAL PROVISIONS

General Compliance

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 and 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.]
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. 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. Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:
 - a. Enter upon the permittee's premises where an emissions source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;
 - b. Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d. 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

5. The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211:
 - a. A notification of the date of initiation of construction, within five working days after occurrence;
 - b. A notification of the date of any suspension of construction, if such suspension lasts for one year or more;
 - c. 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;

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2009.0014

Permittee:	Crop Production Services, Inc.	Facility ID No. 027-00089
Location:	Caldwell, Idaho	

- d. A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
- e. 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, 5/1/94]

Performance Testing

- 6. 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.

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.

Within 30 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]

Monitoring and Recordkeeping

- 7. The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Records of monitoring information 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 and 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]

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2009.0014

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Excess Emissions

8. The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

[IDAPA 58.01.01.130-136, 4/5/00]

Certification

9. 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

10. 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

11. 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

12. 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

13. 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 58.01.01.322.15.h, 5/1/94; 40 CFR 70.6(a)(5)]