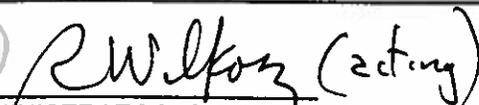


STATE OF IDAHO PERMIT TO CONSTRUCT AN AIR POLLUTION EMITTING SOURCE		PERMIT NUMBER 0 7 7 - 0 0 0 0 6			
		AQCR 0 6 1	CLASS A 1	SIC 2 8 7 4	
		ZONE 1 2	UTM COORDINATE (km) 3 7 5 . 6 . 4 7 5 1 . 6		
1. PERMITTEE J.R. Simplot Company - Don Siding Plant					
2. PROJECT Defluorination Project - Granulation III Plant					
3. MAILING ADDRESS P.O. Box 912		CITY Pocatello		STATE Idaho	ZIP CODE 83204
4. SITE LOCATION COUNTY Power	NO. OF FULL-TIME EMPLOYEES 500		PROPERTY AREA AT SITE (Acreage) 900		
5. PERSON TO CONTACT Ward Wolleson		TITLE Engineer		TELEPHONE (208) 238-2870	
6. EXACT PLANT LOCATION South ½ Section 7, R 34E, 46S					
7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS Manufacture of Nitrogen, Phosphate, and Sulfate fertilizers.					
8. GENERAL CONDITIONS This permit is issued according to the <i>Rules for the Control of Air Pollution in Idaho</i> , Section 16.01.01.200, and pertains only to emissions of air contaminants that are regulated by the State of Idaho and to the sources specifically allowed to be constructed 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 Idaho Department of Health and Welfare, Division of Environmental Quality (DEQ) or its officers, agents, or employees, assumes 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 is not transferable to another person, place, piece or set of 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 of design or equipment that result in any change in the nature or amount of emissions must be approved in advance by DEQ unless exempted by the <i>Rules for the Control of Air Pollution in Idaho</i> Sections 220 through 223.					
 ADMINISTRATOR, STATE AIR QUALITY PROGRAM DIVISION OF ENVIRONMENTAL QUALITY				DATE: November 12, 1999	

**PERMIT TO CONSTRUCT
PERMITTEE, PROJECT, AND LOCATION**

PERMIT NUMBER

J.R. Simplot Company - Don Siding Plant
Defluorination Project - Granulation III Plant
Pocatello, Idaho

0 7 7 - 0 0 0 0 6

SOURCE

Defluorination Process

1. EMISSION LIMITS

1.1 Baghouse Vent Emission Limits

Particulate matter with an aerodynamic diameter less than, or equal to, a nominal ten micrometers (PM-10) from the baghouse vent shall not exceed any corresponding emission rate limits listed in Appendix A of this permit.

1.2 Granulation III Stack Emission Limits

Fluoride emissions from the Granulation III stack shall not exceed any corresponding emission rate limits listed in Appendix A of this permit.

1.3 Opacity Limit

Emissions from the baghouse vent, Granulation III stack, or any other stack, vent, or functionally equivalent opening, shall not exceed twenty percent (20%) opacity for a period, or periods, aggregating more than three (3) minutes in any sixty (60) minute period as required by IDAPA 16.01.01.625 (*Rules for the Control of Pollution in Idaho*). Opacity shall be determined by the procedures contained in IDAPA 16.01.01.625.

2. OPERATING REQUIREMENTS

✓ 2.1 Throughput Limits

The maximum monthly throughput of phosphorous pentoxide (P₂O₅) to the process shall not exceed six thousand, two hundred and fifty tons per month (6,250 T/mo). The maximum annual throughput of P₂O₅ to the process shall not exceed seventy-five thousand tons per any consecutive 12-month period (75,000 T/yr).

✓ 2.2 Baghouse Pressure Drop

The pressure drop across the baghouse shall be maintained within manufacturer's and Operation and Maintenance (O&M) Manual specifications. Documentation of the operating pressure drop specifications for the baghouse shall remain on site at all times and shall be made available to DEQ representatives upon request.

✓ 2.3 Scrubber Pressure Drop and Flowrate

The pressure drop and liquid flowrate of the wet scrubber shall be maintained within manufacturer's and Operation and Maintenance (O&M) Manual specifications. Documentation of the operating pressure drop and liquid flowrate specifications for the scrubber shall remain on site at all times and shall be made available to DEQ representatives upon request.

DATE: November 12, 1999

PERMIT TO CONSTRUCT
PERMITTEE, PROJECT, AND LOCATION

J.R. Simplot Company - Don Siding Plant
 Defluorination Project - Granulation III Plant
 Pocatello, Idaho

PERMIT NUMBER

0 7 7 - 0 0 0 0 6

SOURCE

Defluorination Process

3. **MONITORING AND RECORDKEEPING REQUIREMENTS**

3.1 Operations and Maintenance Manual Requirements

Within sixty (60) days after startup, the Permittee shall have developed an Operations and Maintenance (O&M) Manual for the baghouse and wet scrubber system which describes the procedures that will be followed to comply with General Provision B and Sections 2.2 and 2.3 of this permit. This manual shall remain on site at all times and shall be made available to DEQ representatives upon request.

3.2 Throughput Monitoring

Each month, the Permittee shall monitor and record the throughput of P_2O_5 to the process for that month and for the most recent 12-month period. The most recent two (2) years' compilation of data shall be kept on site and shall be made available to DEQ representatives upon request.

3.3 Monitor Baghouse and Scrubber Parameters

The Permittee shall monitor and record the following information. The most recent two (2) years' compilation of records shall be kept on site, in a log, and shall be made available to DEQ representatives upon request.

3.3.1 When in operation, the pressure drop across the baghouse once on a daily basis.

3.3.2 When in operation, the pressure drop across the scrubber once on a daily basis.

3.3.3 When in operation, the liquid flowrate of the scrubber once on a daily basis.

3.4 Performance Test

The Permittee shall conduct a performance test to measure fluoride emissions from the Granulation III stack to demonstrate compliance with the emission rate limit listed in Appendix A of this permit. This performance test, and any subsequent performance tests conducted to demonstrate compliance, shall be performed in accordance with IDAPA 16.01.01.157, General Provision F of this permit, and the following requirements:

3.4.1 Visible emissions shall be observed during each performance test run using the methods specified in IDAPA 16.01.01.157.

3.4.2 The pressure drop and liquid flowrate of the scrubber shall be monitored and recorded during each performance test.

3.4.3 The throughput in pounds per hour (lb/hr) to the defluorination process shall be recorded during each performance test.

DATE: November 12, 1999

**PERMIT TO CONSTRUCT
PERMITTEE, PROJECT, AND LOCATION**

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Pocatello, Idaho

0 7 7 - 0 0 0 0 6

SOURCE

Defluorination Process

3.4.4 All process areas which emit fluoride emissions out the Granulation III stack shall be in operation during the performance test. Production throughput for each process area shall also be monitored and recorded for each performance test run.

4. REPORTING REQUIREMENTS

4.1 Performance Test Report

The Permittee shall submit a report of the results of the performance test required in Section 3.4 of this permit, including all required process data, to DEQ within thirty (30) days after the date on which the performance test is concluded.

4.2 Certification of Documents

All documents including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, and compliance certifications submitted to DEQ 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 compl

DATE: November 12, 1999

**PERMIT TO CONSTRUCT
PERMITTEE, PROJECT, AND LOCATION**

J.R. Simplot Company - Don Siding Plant
Defluorination Project - Granulation III Plant
Pocatello, Idaho

PERMIT NUMBER

0 7 7 - 0 0 0 0 6

SOURCE

Defluorination Process

APPENDIX A

J.R. Simplot Company, Pocatello

Emission Limits^a - Hourly (lb/hr) and Annual^b (T/yr)

Source Description	PM-10		Fluoride ^c	
	lb/hr	T/yr	lb/hr	T/yr
Baghouse Vent	0.28	1.2	--	--
Granulation III Stack	--	--	1.7	7.45

- As determined by a pollutant-specific U.S. EPA reference method, DEQ-approved alternative, or as determined by DEQ's emission estimation methods used in this permit analysis.
- As determined by multiplying the actual, or allowable (if actual is not available), pound-per-hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.
- Fluoride emission limit as stated in the facility operating permit issued June 29, 1995.

DATE: November 12, 1999

PERMIT TO CONSTRUCT GENERAL PROVISIONS

- A. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the *Rules for Control of Air Pollution in Idaho*. The emission of any pollutant in excess of the limitations specified herein, 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.
- B. 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.
- C. The Permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
1. To enter at reasonable times upon the premises where an emission source is located, or in which any records are required to be kept under the terms and conditions of this permit; and
 2. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack emission testing in conformance with IDAPA 16.01.01.157 when deemed appropriate by the Director.
- D. Nothing in this permit is intended to relieve or exempt the Permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
- E. The Permittee shall notify DEQ, in writing, of the required information for the following events within five (5) working days after occurrence:
1. Initiation of Construction - Date
 2. Completion/Cessation of Construction - Date
 3. Actual Production Startup - Date
 4. Initial Date of Achieving Maximum Production Rate - Production Rate and Date
- F. If emission testing is specified, the Permittee must schedule such testing within sixty (60) days after achieving the maximum production rate, but not later than one hundred and eighty (180) days after initial startup. Such testing must **strictly** adhere to the procedures outlined in IDAPA 16.01.01.157 and shall not be conducted on weekends or state holidays without prior written DEQ approval. Testing procedures and specific time limitations may be modified by DEQ by prior negotiation if conditions warrant adjustment. DEQ shall be notified at least fifteen (15) days prior to the scheduled compliance test. Any records or data generated as a result of such compliance test shall be made available to DEQ upon request.

The maximum allowable operating rate shall be limited to 120% of the average operating rate attained during any performance test period, for which a test protocol has been granted prior approval by DEQ, unless (1) the test demonstrates noncompliance, (2) a more restrictive operating limit is specified elsewhere in this permit, or (3) at such an operating rate, emissions would exceed any emission limit(s) set forth in this permit.

- G. 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.

DATE: August 12, 1999