November 10, 1999

MEMORANDUM

TO: Orville D. Green, Administrator
State Air Quality Program

FROM: Susan J. Richards, Program Manager
Air Quality Permit Program

SUBJECT: P-990015, J.R. Simplot Company, Pocatello
(Defluorination Project at the Granulation #3 Plant - Don Siding Plant)

PROJECT DESCRIPTION

The J.R. Simplot Company proposes to install two batch defluorination reactors and related process equipment at the existing Granulation #3 plant located at the Don Siding Facility in Pocatello, Idaho. Phosphoric acid will be heated in reactor tanks and a silica source (diatomaceous earth) will be added in a batch process. Fluoride in the acid will be volatilized as silica tetrafluoride (SiF_4) and removed from the acid by transfer to the air stream. Fluoride emissions will be controlled by a wet scrubber before exhausting through the existing Granulation #3 stack at the facility. The defluorinated acid will then be used in the production of animal feed supplements and fertilizer in the existing Granulation #3 plant.

DISCUSSION

On February 1, 1999, DEQ received a PTC application from the J.R. Simplot Company. On March 12, 1999, DEQ determined the application complete. On June 2, June 18, and July 2, 1999, DEQ received additional information to the application. On June 23, 1999, DEQ issued a 15 Day Pre-Permit construction approval letter. On July 20, 1999, DEQ received a request for a public comment period. On August 25, 1999, a public comment period began for this project. On October 1, 1999, DEQ extended the comment period. On October 25, 1999, the comment period closed.

FEES

The J.R. Simplot Company is a major facility as defined in IDAPA 16.01.01.008.10 (*Rules for the Control of Air Pollution in Idaho*) and is therefore subject to registration and registration fees in accordance with IDAPA 16.01.01.526. According to the Air Emissions Database Master List for 1999, the J.R. Simplot Company - Don Siding facility has registered 4765.28 tons of pollutants by paying fees. This modification will increase annual fees by approximately $36.00 per year ($30/T *1.2 T/yr = $36.00).

RECOMMENDATION

Based on review of application materials, comments received during the public comment period, and all applicable state and federal rules and regulations, staff recommends that the J.R. Simplot Company be issued Permit to Construct No. 077-00006 for the Defluorination Process. A public comment period was conducted for this project from August 25 through October 25, 1999. This project does not involve PSD requirements.

SJR/MS/hs G:\AHW\SIMON\PTC\SIMPLOT\FINAL\990015.MM

cc: P. Rayne/AFS
R. Wilkosz/TSB
Pocatello RO
Source File (077-00006)
COF

November 10, 1999

MEMORANDUM

TO: Susan J. Richards, Program Manager
Air Quality Permit Program

FROM: Mike Simon, Air Quality Engineer
State Technical Services Office

SUBJECT: PERMIT TO CONSTRUCT TECHNICAL ANALYSIS
P-990015, J.R. Simplot Company, Pocatello
(Defluorination Project at the Granulation #3 Plant - Don Siding Plant)

PURPOSE

The purpose for this memorandum is to satisfy the requirements of IDAPA 16.01.01.200 (*Rules for the Control of Air Pollution in Idaho*) for issuing Permits to Construct (PTC).

PROJECT DESCRIPTION

The J.R. Simplot Company proposes to install two batch defluorination reaction vessels and related process equipment at the existing Granulation #3 plant located at the Don Siding Facility in Pocatello, Idaho. Phosphoric acid will be heated in the reactor tanks, and a silica source (diatomaceous earth, or DE) will be added in a batch process. Fluoride in the acid will be volatilized as silica tetrafluoride (SiF_4) in the chemical reaction and removed from the acid by transfer to the air stream. Fluoride emissions will then be controlled by a wet scrubber before exhausting through the existing Granulation #3 stack at the facility. The defluorinated acid will then be used in the production of animal feed supplements and fertilizer in the existing Granulation #3 plant. Used scrubber water will be pumped and applied to the gypsum stack.

SUMMARY OF EVENTS

On February 1, 1999, the Idaho Department of Health and Welfare, Division of Environmental Quality (DEQ) received a PTC application from the J.R. Simplot Company. On March 12, 1999, DEQ determined the application complete. On June 2, 1999, DEQ received process description information for the application. On June 18, 1999, DEQ received information regarding the fate of used scrubber water. On June 23, 1999, DEQ issued a 15 Day Pre-Permit construction approval letter. On July 2, 1999, DEQ received additional information regarding the potential fluoride emissions at the gypsum stack. On July 13, 1999, DEQ called EPA to determine MACT applicability for the new process. On July 20, 1999, DEQ received a request for a public comment period. On August 25, 1999, a public comment period began for the proposed PTC. On October 1, 1999, DEQ extended the comment period. On October 25, 1999, the comment period ended.

DISCUSSION

1. Process Description

   Low fluoride phosphoric acid is required to make livestock feed supplements and specialty fertilizers. Current practice is to defluorinate phosphoric acid by diluting superphosphoric acid and reprocess in the superphosphoric acid evaporators. The J.R. Simplot Company states that this process ties up the evaporators and is a significant consumer of energy.

The proposed defluorination equipment will be added to the Granulation #3 plant which will consume up to 4 tons of diatomaceous earth (DE) per batch (two per day) and will receive DE by pneumatic truck approximately every other day. Each truck load is approximately 35 tons of DE and takes approximately two and a half hours to unload. The pneumatic transfer of DE to the facility will involve a baghouse used to separate the DE from the air stream. The manufacturer guarantee for PM-10 emissions from the baghouse is 0.02 gr/dscf.

A side stream of air from an existing baghouse will be used to strip fluoride from the hot treated acid. The fluoride enriched air stream from the reactors will then be scrubbed in a cross flow, multi-section packed bed scrubber. Scrubber discharge air will re-combine with existing ventilation streams before exiting through the existing Granulation III stack to the atmosphere.

Used scrubber water from the defluorination scrubber will be delivered to the suction of the gypsum transport pumps that move the gypsum slurry to the gypstack. The expected flow from the scrubber to the gypsum slurry is between 40-50 gpm and will combine with the existing slurry flowrate of 1000 - 3000 gpm to the gypsum stack. Average slurry flowrates are stated to be 2600 gpm.

2. Emission Estimates

Emission estimates for this project were performed by the applicant and reviewed by DEQ. The regulated air pollutants expected to be emitted from this project are PM-10, silica, and fluoride.

This project consists of three sources which emit regulated air pollutants to the atmosphere. The first source is a baghouse which will emit silica dust as PM-10. The baghouse is used as process equipment to separate diatomaceous earth from the air stream during pneumatic truck unloading. The second source is the defluorination process which has fluoride emissions controlled by a cross flow packed bed scrubber before exhausting through the existing Granulation III stack. The third source is the gypsum stack where the used scrubber water will be applied.

2.1 Diatomaceous Earth (DE) Baghouse Emission Estimates

The baghouse manufacturer guarantees 0.02 gr/dscf for PM-10 emissions. The baghouse will only operate during the pneumatic transfer of DE from trucks to the facility. The expected annual operation of truck unloading is 320 hr/yr. Based on a maximum flowrate of 300 cfm out the baghouse vent and 320 hr/yr operation, the expected PM-10 and silica emissions are 0.05 lb/hr and 0.008 T/yr.

As shown in the modeling section of this memo, the maximum PM-10 emission which demonstrates compliance with both the silica acceptable ambient concentration and the PM-10 significant contribution requirements is 0.28 lb/hr and 1.2 T/yr (based on 8,760 hr/yr operation). Per DEQ's current permitting policy, this value will be the allowable PM-10 emission rate limit used in the PTC which provides for maximum operation flexibility.

2.2 Defluorination Process Emission Estimates

The fluoride rich air stream from the batch reactor vessels will be scrubbed in a cross flow, multi-section packed bed scrubber. The fluoride removal efficiency, stated by the scrubber manufacturer, is expected to be at least 99.98%. Maximum fluorine loading expected to the scrubber is 515 lb/hr. Using the expected removal efficiency, the maximum controlled fluoride emissions are 0.11 lb/hr and 0.5 T/yr. The scrubber exhaust will then combine with existing facility ventilation streams and exhaust out through the existing Granulation III stack.

In regulating fluoride emissions from this new process, a review was conducted of the existing air quality Operating Permit No. 077-00006, dated June 29, 1995. This permit regulates fluoride emissions out the Granulation III stack at 1.7 lb/hr and 7.45 T/yr.

The applicant has requested that the existing allowable fluoride emission limits do not require modification and will provide enough flexibility for the additional fluoride emissions expected from the new defluorination process. Therefore, this emission rate limit will be placed in the PTC and a performance test will be required to demonstrate compliance.

2.3 Gypsum Stack Emission Estimates

Used scrubber water from the cross flow packed bed scrubber will be delivered to the gypsum transport pumps that move the gypsum slurry to the gypsum stack. The transport slurry volume currently operates between 1500 - 3000 gpm. The added volume expected from used scrubber water is between 40 - 50 gpm.

A fluoride emission factor range is specified in an EPA report entitled "*Evaluations of Emissions and Control Techniques for Reducing Fluoride Emissions from Gypsum ponds in the Phosphoric Acid Industry*" (EPA-600/2-78-124, June 1978). From this document, a suggested emission factor of 0.1 to 10.0 lb/day-acre is given for Fluoride emissions from gypsum ponds.

Based on a telephone conversation conducted on 7/13/99 between Mike Simon of DEQ and David Painter of EPA Research Triangle Park, there have been studies using the Fourier Transform Infrared Spectroscopy (FTIR) where HF was measured at two facilities. Mr. Painter said that measurements on gypsum pond emissions were consistent with the emission factor of 0.2 lb/day-acre. Mr. Painter also explained that the MACT standard did not target the gypsum stack.

In an effort to address the potential fluoride emission increase at the gypsum stack, the J.R. Simplot Company submitted a letter using an emission factor of 1.6 lb/day-acre. Based on a 50 gpm used scrubber water flowrate, the theoretical increase in ponded area would be less than 2 acres. Using these assumptions, potential fluoride emissions are then approximately 0.5 T/yr. Short term emissions, based on 8,760 hr/yr operation, would be 0.11 lb/hr.

3. Modeling

A modeling analysis was performed using EPA approved Screen 3 computer model to determine maximum off-site impacts from PM-10 and silica emissions from this proposed project. The following is a summary of the modeling analysis, and modeling results are attached as Appendix A to this technical memorandum.

3.1 Diatomaceous Earth (DE) Baghouse Modeling Analysis

Using a 1.0 lb/hr unity emission rate for the baghouse, the maximum Screen 3 results were calculated to be 44.83 $\mu g/m^3$, based on a 1 hour average. Using the potential PM-10 emissions of 0.051 lb/hr, the 24 hour and annual PM-10 impacts are 0.9 $\mu g/m^3$ and 0.18 $\mu g/m^3$ respectively. These values are well below the PM-10 non-attainment area standards of 5.0 $\mu g/m^3$ 24-hr and 1.0 $\mu g/m^3$ annual averages.

Back calculating the maximum PM-10 emission rate, which demonstrates compliance with the non-attainment area standards, became 0.28 lb/hr and 1.2 T/yr. This is the maximum allowable emission rate limit which will be placed in the permit.

All PM-10 emissions from the baghouse will be Silica (diatomaceous earth), which is a listed non-carcinogenic Toxic Air Pollutant with an emissions screening (EL) value of 0.667 lb/hr and an acceptable ambient concentration of 0.5mg/m^3. Since potential emissions have been estimated to be below the EL, no further analysis is required.

3.2 Defluorination Process Modeling Analysis

Because there will be no increase in allowable fluoride emissions from the Granulation III stack, modeling was not required.

3.3 Gypsum Stack Modeling Analysis

The potential increase in fluoride emissions at the gypsum stack from the used scrubber water has been estimated to be 0.11lb/hr and 0.5 T/yr. The EL value for fluoride is 0.167 lb/hr; therefore, modeling was not required.

4. Facility Classification

The facility is a major facility as defined in IDAPA 16.01.01.006.55. The facility is a designated facility as defined in IDAPA 16.01.01.006.27. The SIC code defining the facility is 2874 and the AIRS classification is A1.

5. Area Classification

The facility is located in Pocatello which is in Air Quality Control Region 61. This area is designated as non-attainment for PM-10 and is attainment or unclassifiable for all other criteria air pollutants.

6. Regulatory Review

This section provides a summary of the primary air quality regulations which were reviewed by DEQ staff for this project. For each regulation sited, a brief explanation of applicability is given.

6.1 IDAPA 16.01.01.201 Permit to Construct Required

A PTC will be required for this project because the sources require limitation on the potential to emit to protect ambient air quality standards.

6.2 IDAPA 16.01.01.210 Demonstration of Preconstruction Compliance with Toxic Standards

The proposed project would emit fluoride and silica emissions which are listed state toxic air pollutants.

6.3 IDAPA 16.01.01.577 Ambient Air Quality Standards for Specific Air Pollutants

The proposed project would emit PM-10 which has a specific ambient standard.

6.4 MACT Standards - 40 CFR 63, Subpart BB -- National Emission Standards for Hazardous Air Pollutants from Phosphate Fertilizer Production Plants (effective date is June 10, 1999).

The proposed project is located at the J.R. Simplot Facility - Don Siding Plant. This facility is applicable to the recently promulgated NESHAP standard for phosphate fertilizer plants. The proposed defluorination project is not applicable to this regulation and was verified by a 7/13/99 telephone call from Mike Simon of DEQ to David Painter of EPA, RTP.

7. Permit Requirements

This section is intended to outline the regulatory and technical basis for the permit limitations.

7.1 Emission Limits

A PM-10 emission limit for the baghouse has been established at 0.28 lb/hr and 1.2 T/yr. This is the maximum PM-10 emission rate which demonstrates compliance, through dispersion modeling, with the PM-10 significant contribution requirements for non-attainment areas.

Fluoride emissions from the defluorination process will be regulated at the Granulation III plant stack. Existing allowable fluoride emission limits of 1.7 lb/hr and 7.45 T/yr are currently established at this stack by an operating permit issued June 29, 1995. This PTC will contain the same fluoride emission limit as the operating permit, because the facility has not requested an increase in allowable emissions at

this stack. The facility has stated in their PTC application that the current allowable emission limit has enough flexibility for the additional fluorides from the proposed defluorination equipment.

7.2 Operating Requirements

A throughput limit of phosphorous pentoxide (P_2O_5) to the defluorination process has been established at 6,250 T/mo and 75,000 T/yr. The limit is in terms of P2O5 which is consistent with the design of the process and with how EPA regulates wet phosphoric acid plants (See 40 CFR 60, Subpart T).

The Permittee will also be required to maintain the baghouse pressure drop and wet scrubber (cross flow packed bed scrubber) pressure drop and flowrate within the Operation and Maintenance Manual requirements.

7.3 Monitoring and Recordkeeping Requirements

The Permittee will be required to develop an Operation and Maintenance Manual for the baghouse and scrubber. This manual should present the maintenance procedures and inspection frequencies used to keep the equipment in good working order, along with the required pressure drop ranges and minimum liquid scrubber flowrate. These operating ranges must be derived from the manufacturer's written specifications or, where specific manufacturer's specifications are unavailable, the Permittee must document the limits to be used for determining compliance.

The Permittee is also required to conduct a performance test to measure fluoride emissions from the Granulation III stack to demonstrate compliance with the emission rate limit. The defluorination process is one of several processes which vent to this stack and contribute to fluoride emissions. Since the Permittee has requested that the existing allowable emissions are sufficient to allow for the increment in fluoride emissions from the new defluorination process, a stack test will be required.

7.4 Reporting Requirements

The only reporting the permit specifies is the test report which must be submitted to DEQ within 30 days after the date the test is concluded.

8. Permit Coordination

A draft copy of the PTC and technical analysis was presented for review to the Pocatello Regional Office and to the State Office for staff review.

9. AIRS Information

Information necessary to the AIRS database is included as Attachment B of this Technical Memorandum.

FEES

The J.R. Simplot Company is a major facility as defined in IDAPA 16.01.01.008.10 and is therefore subject to registration and registration fees in accordance with IDAPA 16.01.01.526. According to the Air Emissions Database Master List for 1999, the J.R. Simplot Company - Don Siding facility has registered 4765.28 tons of pollutants by paying fees. This modification will increase annual fees by approximately $36.00 per year ($30/T *1.2 T/yr = $36.00).

RECOMMENDATION

Based on a review of application materials, comments received during the public comment period, and all applicable state and federal rules and regulations, staff recommends that the J.R. Simplot Company be issued Permit to Construct No. 077-00006 for the Defluorination Process. A public comment period was conducted for this project from August 25 through October 25, 1999. This project does not involve PSD requirements.

MS/hs G:\AHW\SIMON\PTC\SIMPLOT\FINAL\990015.TM

cc: R. Wilkosz
P. Rayne/AFS
Pocatello RO
H. Elshafei/TS
Source File (077-00006)
COF

APPENDIX A

J.R. Simplot Company - Don Siding Plant
Defluorination Project (P-990015)

MODELING ANALYSIS

6/03/99

5:16:09

*** SCREEN3 MODEL RUN ***
*** VERSION DATED 96043 ***

Simplot - Baghouse Vent

SIMPLE TERRAIN INPUTS:

SOURCE TYPE	=	POINT
EMISSION RATE (G/S)	=	.126000
STACK HEIGHT (M)	=	16.7640
STK INSIDE DIAM (M)	=	.2042
STK EXIT VELOCITY (M/S)	=	4.3238
STK GAS EXIT TEMP (K)	=	288.7056
AMBIENT AIR TEMP (K)	=	293.1500
RECEPTOR HEIGHT (M)	=	.0000
URBAN/RURAL OPTION	=	RURAL
BUILDING HEIGHT (M)	=	.0000
MIN HORIZ BLDG DIM (M)	=	.0000
MAX HORIZ BLDG DIM (M)	=	.0000

THE REGULATORY (DEFAULT) MIXING HEIGHT OPTION WAS SELECTED.
THE REGULATORY (DEFAULT) ANEMOMETER HEIGHT OF 10.0 METERS WAS ENTERED.

TA > TS!!! BUOY. FLUX SET = 0.0

BUOY. FLUX = .000 M**4/S**3; MOM. FLUX = .195 M**4/S**2.

*** FULL METEOROLOGY ***

****
*** SCREEN AUTOMATED DISTANCES ***
****

*** TERRAIN HEIGHT OF 0. M ABOVE STACK BASE USED FOR FOLLOWING DISTANCES ***

DIST (M)	CONC (UG/M**3)	STAB	U10M (M/S)	USTK (M/S)	MIX HT (M)	PLUME HT (M)	SIGMA Y (M)	SIGMA Z (M)	DWASH
1.	.0000	1	1.0	1.0	320.0	19.32	.53	.38	NO
100.	39.61	1	1.0	1.0	320.0	19.32	26.86	13.97	NO
200.	44.74	3	1.0	1.1	320.0	19.28	23.63	14.0	

5	NO								
	300.	38.49	4	1.0	1.1	320.0	19.22	22.62	12.1
1	NO								
	400.	37.40	4	1.0	1.1	320.0	19.22	29.46	15.2
9	NO								
	500.	32.33	4	1.0	1.1	320.0	19.22	36.15	18.3
1	NO								
	600.	31.01	5	1.0	1.2	10000.0	18.97	31.94	14.7
1	NO								
	700.	28.49	5	1.0	1.2	10000.0	18.97	36.78	16.5
2	NO								
	800.	26.79	6	1.0	1.3	10000.0	18.76	27.64	11.9
9	NO								
	900.	26.63	6	1.0	1.3	10000.0	18.76	30.78	12.9
9	NO								
	1000.	25.88	6	1.0	1.3	10000.0	18.76	33.89	13.9
6	NO								

MAXIMUM 1-HR CONCENTRATION AT OR BEYOND 1. M:

	193.	44.83	3	1.0	1.1	320.0	19.28	22.98	13.6
6	NO								

DWASH= MEANS NO CALC MADE (CONC = 0.0)
DWASH=NO MEANS NO BUILDING DOWNWASH USED
DWASH=HS MEANS HUBER-SNYDER DOWNWASH USED
DWASH=SS MEANS SCHULMAN-SCIRE DOWNWASH USED
DWASH=NA MEANS DOWNWASH NOT APPLICABLE, X<3*LB

*** INVERSION BREAK-UP FUMIGATION CALC. ***
CONC (UG/M**3) = .0000
DIST TO MAX (M) = 100.00

DIST TO MAX IS < 2000. M. CONC SET = 0.0

****
*** SUMMARY OF SCREEN MODEL RESULTS ***
****

CALCULATION PROCEDURE	MAX CONC (UG/M**3)	DIST TO MAX (M)	TERRAIN HT (M)
SIMPLE TERRAIN	44.83	193.	0.

→ $44.83 \frac{\frac{ug}{m^3}}{\frac{lb}{hr}}$ [1-hr]

$\left(0.02 \frac{gr}{CF}\right)\left(300 \frac{CF}{min}\right)\left(\frac{lb}{7000 gr}\right)\left(\frac{60 min}{hr}\right) = 0.051 \frac{lb}{hr}$

PM-10 24-hr:

$\left(\frac{44.83 \frac{ug}{m^3}}{\frac{16}{hr}}\right)(0.05)(0.4)\left(\frac{24}{24}\right) = 0.897 \frac{ug}{m^3} < 5.0 \frac{ug}{m^3}$ [24-hr] OK

PM-10 ANNUAL:

$(44.83)(0.05)(0.08) = 0.18 \frac{ug}{m^3}$ annual $< 1.0 \frac{ug}{m^3}$ OK

Maximum Flexibility Calculation

- PM-10 vs. Silica @ Baghouse vent Outlet.
- Screen 3 modeling @ 1 lb/hr is 44.83 ug/m^3 [1-hr]

Solving for max PM-10 emission becomes:

24-hr => $(44.83) * X \frac{lb}{hr} * 0.4 = 5.0 \frac{ug}{m^3}$

$$X = \frac{5.0}{(0.4)(44.83)} = \underline{\underline{0.279 \frac{lb}{hr} \text{ PM-10}}}$$

Annual => $(44.83)(X)(0.08) = 1.0 \frac{ug}{m^3}$

$$X = \frac{1.0}{(44.83)(0.08)} = \underline{\underline{0.279 \frac{lb}{hr} \text{ PM-10}}}$$

Solving for max Silica emission becomes:

24-hr => $(44.83)(0.125)(X \frac{lb}{hr}) = 500 \frac{ug}{m^3}$

$$X = \frac{500}{(44.83)(0.125)} = \underline{\underline{89.23 \frac{lb}{hr}}}$$

The most limiting standard is the PM-10 significant contribution requirements for non-attainment areas.

Baghouse E.L. is $\boxed{0.28 \frac{lb}{hr} \& 1.2 T/yr}$

APPENDIX B

J.R. Simplot Company - Don Siding Plant
Defluorination Project (P-990015)

AIRS INFORMATION

P[illegible]REVIATED AIRS DATA ENTRY [illegible]EET

Name of Facility: J.R. Simplot Company - Don Sid

AIRS/Permit #: 077-00006

Permit Issue Date: June 1999

*Source/Emissions Unit Name (25 spcs) (Please use name as indicated in permit)	SCC # (8 digit #)	Air Program (SIP/NESHAP/ NSPS/PSD)
* Diatomaceous Earth Baghouse	30507601	SIP
Defluorination Process	?	SIP
I cant find one		

RETURN TO PAT RAYNE

AIRS-PT.LST (9/95)

Permit File

STATE OF IDAHO
DIVISION OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
C. Stephen Allred, Administrator

November 12, 1999

CERTIFIED MAIL # Z 273 659 115

Ward Wolleson, Engineer
J.R. Simplot Company
Minerals & Chemical Group - Don Plant
P.O. Box 912
Pocatello, Idaho 83204

RE: P-990015, J.R. Simplot Company, Pocatello
(Defluorination Project at the Granulation #3 Plant - Don Siding Plant)

Dear Mr. Wolleson:

On February 1, 1999, the Idaho Department of Health and Welfare, Division of Environmental Quality (DEQ) received a Permit to Construct (PTC) application from the J.R. Simplot Company for the proposed construction of defluorination equipment at the Granulation #3 plant at the Don Siding Facility located in Pocatello, Idaho. On March 12, 1999, the application was determined complete. On June 23, 1999, DEQ issued a pre-construction approval for this project. On July 20, 1999, DEQ received a request for a public comment period. A public comment period was conducted from August 25 through October 25, 1999. Based on review of all application materials, comments received, and all applicable state and federal rules and regulations, DEQ finds that this project meets the provisions of IDAPA 16.01.01.200 (*Rules for the Control of Air Pollution in Idaho*). Enclosed is PTC No. 077-00006 for the defluorination equipment.

This permit does not release the Permittee from compliance with all other applicable federal, state, local, or tribal laws, regulations, or ordinances.

Please pay particular attention to the reporting requirements contained in Paragraph E of the General Provisions section of the permit. This information is needed to properly track the progress of the permit. Please refer to the appropriate permit number when submitting reports required in the Reporting Requirements section of the permit.

You are strongly encouraged to request a meeting with DEQ to discuss the permit terms and requirements with which your facility must comply. Mr. Rick Elkins of the Pocatello Regional Office will contact you regarding this meeting. DEQ strongly recommends that, in addition to your facility's plant manager, your responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions also attend the meeting.

You, as well as any other entity, may have the right to appeal this final agency action pursuant to the Idaho Department of Health and Welfare Rules, Title 5, Chapter 3, "Rules Governing Contested Case Proceedings and Declaratory Rulings," by filing a petition with the Hearings Coordinator, Department of Health and Welfare, Administrative Procedures Section, 450 West State Street, Tenth Floor, Boise, Idaho 83720-5450, within thirty-five (35) days of the date of this decision. However, DEQ encourages you to contact the Air Quality Permit Program to address any concerns you may have with the enclosed permit prior to filing a petition for a contested case.

If you have any questions regarding the terms or conditions of the enclosed permit, please contact Sue Richards, Air Quality Permit Program Manager, at (208) 373-0502.

Sincerely,

RW for:

Orville D. Green
Administrator
State Air Quality Program

ODG/MS/hs G:\AHW\SIMON\PTC\SIMPLOT\FINAL\990015.PL

Enclosures

cc: R. Wilkosz
P. Rayne, AFS
R. Elkins, Pocatello RO
H. Elshafei/TS
L. Kral, EPA Region X
Permit File Manual
Source File (077-00006)
COF