



DEC 07 2012

Matthew Frank
JR Simplot Company
PO Box 128
Helm, CA 93627

**Re: Notice of Minor Title V Permit Modification
District Facility # C-705
Project # C-1092746**

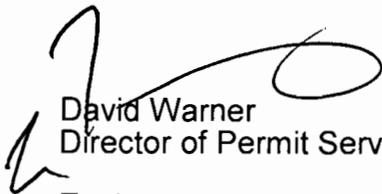
Dear Mr. Frank:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued C-705-4-6 and '-15-0 into the Title V operating permit. JR Simplot Company requested to install a new limestone railcar unloading system and add the limestone bin and truck receiving from permit unit '-4 to this permit unit.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued C-705-4-6 and '-15-0, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Jim Swaney at (559) 230-5900.

Sincerely,



David Warner
Director of Permit Services

Enclosures

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585



DEC 07 2012

Gerardo C. Rios, Chief
Permits Office
Air Division
U.S. EPA - Region IX
75 Hawthorne St
San Francisco, CA 94105

Re: **Notice of Minor Title V Permit Modification**
District Facility # C-705
Project # C-1092746

Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. JR Simplot Company is proposing a Title V minor permit modification to incorporate the recently issued C-705-4-6 and '-15-0 into the Title V operating permit. JR Simplot Company requested to install a new limestone railcar unloading system and add the limestone bin and truck receiving from permit unit '-4 to this permit unit.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued C-705-4-6 and '-15-0, emission increases, application, and previous Title V permit. Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Jim Swaney at (559) 230-5900.

Sincerely,


David Warner
Director of Permit Services

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Tel: 661-392-5500 FAX: 661-392-5585

TITLE V APPLICATION REVIEW

Minor Modification
Project #: C-1092746

Engineer: Brian Clements
Lead Engineer: Sheraz Gill
Date: 11/28/12

Facility Number: C-705
Facility Name: JR Simplot Company
Mailing Address: PO Box 128
Helm, CA 93627

Contact Name: Matthew Frank
Phone: (559) 392-6902

Responsible Official: Matthew Frank
Title: Production Manager

I. PROPOSAL

JR Simplot Company is proposing a Title V minor permit modification to incorporate the recently issued C-705-4-6 and C-705-15-0 into the Title V operating permit. Simplot is proposing to modify the limestone handling operations by making the following changes:

C-705-4-6:

- Remove the limestone bin and truck receiving from permit C-705-4 to new permit unit C-705-15-0. The unloading operations were determined to be a separate permit unit per District Policy APR 1025 (Permit Unit Determination). There will not be any physical changes to the equipment. Therefore, the proposal is not considered an NSR modification under this project.

C-705-15-0:

- Install a new limestone railcar unloading system and add the limestone bin and truck receiving from permit C-705-4 to this permit unit. Replace the existing baghouse on the limestone bin and truck receiving operation.

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements and to provide the legal and factual basis for the proposed revisions.

II. FACILITY LOCATION

12688 S. Colorado Ave. in Helm, CA.

III. EQUIPMENT DESCRIPTIONS

Pre-Project PTO:

C-705-4-5: CALCIUM AMMONIUM NITRATE (CAN-17) PLANT WITH 100 TON LIMESTONE STORAGE BIN SERVED BY FLEX KLEEN GJ-115 BAGHOUSE, SCREW CONVEYOR, DISSOLVER, NEUTRALIZER, 2 SCRUBBERS, SCRUBBER TANK, ENTRAINMENT SEPARATOR, 4 SETTLING TANKS, 2 STORAGE TANKS, SLUDGE TANK AND ASSOCIATED PUMPS

ATCs:

C-705-4-6: MODIFICATION CALCIUM AMMONIUM NITRATE (CAN-17) PLANT WITH 100 TON LIMESTONE STORAGE BIN SERVED BY FLEX KLEEN GJ-115 BAGHOUSE, SCREW CONVEYOR, DISSOLVER, NEUTRALIZER, 2 SCRUBBERS, SCRUBBER TANK, ENTRAINMENT SEPARATOR, 4 SETTLING TANKS, 2 STORAGE TANKS, SLUDGE TANK AND ASSOCIATED PUMPS: MOVE LIMESTONE BIN AND LIMESTONE TRUCK RECEIVING FROM '4 TO PERMIT UNIT '-15-0.

C-705-15-0: LIMESTONE RECEIVING OPERATION CONSISTING OF A TRUCK UNLOADING SYSTEM WITH A 100 TON LIMESTONE BIN SERVED BY A SMOOTH MODEL 60BV36 BAGHOUSE AND RAILCAR UNLOADING SYSTEM WITH A COVERED (2 WALLS AND CURTAINS ON ENTRANCE/EXIT) LIMESTONE RECEIVING SHED AND UNDERGROUND SCREW HOPPER AND UNDERGROUND SCREW CONVEYOR, AND ENCLOSED BELT CONVEYOR AND ENCLOSED TRANSFER HOPPER AND PNEUMATIC TRANSFER CONVEYOR AND SILO SERVED BY FLEX-KLEEN MODEL 84-WUD-48-III BAGHOUSE

Post Project PTOs:

C-705-4-6: CALCIUM AMMONIUM NITRATE (CAN-17) PLANT WITH A SCREW CONVEYOR, DISSOLVER, NEUTRALIZER, 2 SCRUBBERS, SCRUBBER TANK,

ENTRAINMENT SEPARATOR, 4 SETTLING TANKS, 2 STORAGE TANKS,
SLUDGE TANK AND ASSOCIATED PUMPS

C-705-15-0: LIMESTONE RECEIVING OPERATION CONSISTING OF A TRUCK UNLOADING SYSTEM WITH A 100 TON LIMESTONE BIN SERVED BY A SMOOTH MODEL 60BV36 BAGHOUSE AND RAILCAR UNLOADING SYSTEM WITH A COVERED (2 WALLS AND CURTAINS ON ENTRANCE/EXIT) LIMESTONE RECEIVING SHED AND UNDERGROUND SCREW HOPPER AND UNDERGROUND SCREW CONVEYOR, AND ENCLOSED BELT CONVEYOR AND ENCLOSED TRANSFER HOPPER AND PNEUMATIC TRANSFER CONVEYOR AND SILO SERVED BY FLEX-KLEEN MODEL 84-WUD-48-III BAGHOUSE

IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to a Title V permit is considered to be a minor modification and, as such, requires no public review.

V. APPLICABLE REQUIREMENTS

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

The facility would like to remove the limestone bin and truck receiving from permit C-705-4 to new permit unit C-705-15-0. The unloading operations were determined to be a separate permit unit per District Policy APR 1025 (Permit Unit Determination). There will not be any physical changes to the equipment. Therefore, the proposal is not considered an NSR modification under this project.

The facility also proposes a new limestone railcar unloading system and to add the limestone bin and truck receiving from permit C-705-4 to this permit unit; as well as replace the existing baghouse on the limestone bin and truck receiving operation.

C-705-4:

Conditions 2, 10, and 11 on existing PTO C-705-4-5 will be removed since they relate to the baghouse that is no longer referenced on this permit unit.

Condition 1 on ATC C-705-4-6 was satisfied with the submittal of this Title V minor modification application; therefore, will not be included on draft PTO C-705-4-7.

C-705-15:

All the conditions on draft PTO C-705-15-1 are new since this is new permit unit.

Condition 1 on ATC C-705-15-0 was satisfied with the submittal of this Title V minor modification application; therefore, will not be included on draft PTO C-705-4-7.

Conditions 2 and 3 on ATC C-705-15-0, which required the surrender of ERCs, were satisfied via ERC withdrawal project S-1110286; therefore, will not be included on draft PTO C-705-15-1.

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
 - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
 - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

VIII. ATTACHMENTS

- A. Proposed Modified Title V Operating Permit No. C-705-4-7 and '-15-1
- B. Authorities to Construct No. C-705-4-6 and '-15-0
- C. Emissions Increases
- D. Application
- E. Previous Title V Operating Permit No. C-705-4-5

ATTACHMENT A

Proposed Modified Title V Operating Permit
No.'s

C-705-4-7 and '-15-1

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-705-4-7

EXPIRATION DATE: 11/30/2014

EQUIPMENT DESCRIPTION:

CALCIUM AMMONIUM NITRATE (CAN-17) PLANT WITH A SCREW CONVEYOR, DISSOLVER, NEUTRALIZER, 2 SCRUBBERS, SCRUBBER TANK, ENTRAINMENT SEPARATOR, 4 SETTLING TANKS, 2 STORAGE TANKS, SLUDGE TANK AND ASSOCIATED PUMPS

PERMIT UNIT REQUIREMENTS

1. Production rate shall be limited to 500 tons/day of liquid fertilizer solution. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Emissions from CAN-17 process shall not exceed any of the following: PM10: 0.004 lb/ton; ammonia: 0.0005 lb/ton; or nitric acid: 0.0039 lb/ton. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Scrubber sprays and/or nozzles shall be maintained in optimum working condition. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Fan air pressure shall be maintained in the range of 9 to 10" w.c. to sufficiently pull fumes from the dissolver and neutralizer to the primary scrubber. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Primary scrubber shall be equipped with a manometer to measure the relative gauge pressure inside the vessel. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Daily records of liquid fertilizer solution production shall be maintained on site and shall be made available for District inspection upon request. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
7. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
8. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E = 3.59 \times P^{0.62}$; P is less than or equal to 30 tons per hour, or $E = 17.37 \times P^{0.16}$; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
9. Visible emissions shall be inspected quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
10. Weekly records of pressure drop across the scrubbers and the flow rate of scrubber liquid shall be maintained and kept on the premises at all times. Operator shall perform weekly visual qualitative check to make sure that the scrubber liquid is adequately maintained. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-705-15-1

EXPIRATION DATE: 11/30/2014

EQUIPMENT DESCRIPTION:

LIMESTONE RECEIVING OPERATION CONSISTING OF A TRUCK UNLOADING SYSTEM WITH A 400 TON LIMESTONE BIN SERVED BY A SMOOTH MODEL 60BV36 BAGHOUSE AND RAILCAR UNLOADING SYSTEM WITH A COVERED (2 WALLS AND CURTAINS ON ENTRANCE/EXIT) LIMESTONE RECEIVING SHED AND UNDERGROUND SCREW HOPPER AND UNDERGROUND SCREW CONVEYOR, AND ENCLOSED BELT CONVEYOR AND ENCLOSED TRANSFER HOPPER AND PNEUMATIC TRANSFER CONVEYOR AND SILO SERVED BY FLEX-KLEEN MODEL 84-WUD-48-III BAGHOUSE

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102] Federally Enforceable Through Title V Permit
3. PM10 emissions from the dust collector serving the railcar pneumatic conveyance system shall not exceed 0.01 gr/dscf. [District Rule 2201] Federally Enforceable Through Title V Permit
4. PM10 emissions from the dust collector serving the truck unloading operation shall not exceed 0.01 gr/dscf. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The maximum throughput for the railcar unloading shed shall not exceed either of the following limits: 432 tons of material per day or 0.0035 lb PM10/ton of material. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Visible emissions from the railcar unloading shed shall not exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Visible emissions from the exhaust of the dust collector(s) serving the truck unloading and railcar conveyance operations shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E = 3.59 \times P^{0.62}$; P is less than or equal to 30 tons per hour, or $E = 17.37 \times P^{0.16}$; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
9. The baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The differential pressure gauge reading range shall be established per manufacturer's recommendation at time of start up inspection. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Differential operating pressure shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The baghouse shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

13. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Replacement bags numbering at least 10% of the total number of bags in the baghouse shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records of all maintenance of the baghouse, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

DRAFT

ATTACHMENT B

Authorities to Construct No.'s

C-705-4-6 and '-15-0



AUTHORITY TO CONSTRUCT

PERMIT NO: C-705-4-6

ISSUANCE DATE: 03/03/2008

LEGAL OWNER OR OPERATOR: J R SIMPLOT COMPANY

MAILING ADDRESS: PO BOX 128
HELM, CA 93627

LOCATION: 12688 S COLORADO AVE
HELM, CA 93627

EQUIPMENT DESCRIPTION:

MODIFICATION CALCIUM AMMONIUM NITRATE (CAN-17) PLANT WITH 100 TON LIMESTONE STORAGE BIN SERVED BY FLEX KLEEN GJ-115 BAGHOUSE, SCREW CONVEYOR, DISSOLVER, NEUTRALIZER, 2 SCRUBBERS, SCRUBBER TANK, ENTRAINMENT SEPARATOR, 4 SETTLING TANKS, 2 STORAGE TANKS, SLUDGE TANK AND ASSOCIATED PUMPS: MOVE LIMESTONE BIN AND LIMESTONE TRUCK RECEIVING FROM '4 TO PERMIT UNIT '15-0.

CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. Production rate shall be limited to 500 tons/day of liquid fertilizer solution. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Emissions from CAN-17 process shall not exceed any of the following: PM10: 0.004 lb/ton; ammonia: 0.0005 lb/ton; or nitric acid: 0.0039 lb/ton. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Scrubber sprays and/or nozzles shall be maintained in optimum working condition. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Fan air pressure shall be maintained in the range of 9 to 10" w.c. to sufficiently pull fumes from the dissolver and neutralizer to the primary scrubber. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Primary scrubber shall be equipped with a manometer to measure the relative gauge pressure inside the vessel. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Daily records of liquid fertilizer solution production shall be maintained on site and shall be made available for District inspection upon request. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO



DAVID WARNER, Director of Permit Services
C-705-4-6 Nov 28 2012 9:36AM - CLEMENTB : Joint Inspection NOT Required

8. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
9. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E = 3.59 \times P^{0.62}$; P is less than or equal to 30 tons per hour, or $E = 17.37 \times P^{0.16}$; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
10. Visible emissions shall be inspected quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
11. Weekly records of pressure drop across the scrubbers and the flow rate of scrubber liquid shall be maintained and kept on the premises at all times. Operator shall perform weekly visual qualitative check to make sure that the scrubber liquid is adequately maintained. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit



AUTHORITY TO CONSTRUCT

PERMIT NO: C-705-15-0

ISSUANCE DATE: 03/03/2008

LEGAL OWNER OR OPERATOR: J R SIMPLOT COMPANY

MAILING ADDRESS: PO BOX 128
HELM, CA 93627

LOCATION: 12688 S COLORADO AVE
HELM, CA 93627

EQUIPMENT DESCRIPTION:

LIMESTONE RECEIVING OPERATION CONSISTING OF A TRUCK UNLOADING SYSTEM WITH A 100 TON LIMESTONE BIN SERVED BY A SMOOTH MODEL 60BV36 BAGHOUSE AND RAILCAR UNLOADING SYSTEM WITH A COVERED (2 WALLS AND CURTAINS ON ENTRANCE/EXIT) LIMESTONE RECEIVING SHED AND UNDERGROUND SCREW HOPPER AND UNDERGROUND SCREW CONVEYOR, AND ENCLOSED BELT CONVEYOR AND ENCLOSED TRANSFER HOPPER AND PNEUMATIC TRANSFER CONVEYOR AND SILO SERVED BY FLEX-KLEEN MODEL 84-WUD-48-III BAGHOUSE

CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. Prior to operating equipment under this Authority to Construct, permittee shall surrender PM10 emission reduction credits for the following quantity of emissions: 1st quarter - 293 lb, 2nd quarter - 293 lb, 3rd quarter - 293 lb, and fourth quarter - 293 lb. Offsets shall be provided at the applicable offset ratio specified in Table 4-2 of Rule 2201 (as amended 09/21/06). SOx ERCs may be used to offset PM10 increases at an interpollutant ratio of 1.867 lb-SOx : 1.0 lb-PM10 [District Rule 2201] Federally Enforceable Through Title V Permit
3. ERC Certificate Number S-2503-5 (or a certificate split from this certificate) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO



DAVID WARNER, Director of Permit Services
C-705-15-0 : Nov 28 2012 9:37AM - CLEMENTB : Joint Inspection NOT Required

5. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102] Federally Enforceable Through Title V Permit
6. PM10 emissions from the dust collector serving the railcar pneumatic conveyance system shall not exceed 0.01 gr/dscf. [District Rule 2201] Federally Enforceable Through Title V Permit
7. PM10 emissions from the dust collector serving the truck unloading operation shall not exceed 0.01 gr/dscf. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The maximum throughput for the railcar unloading shed shall not exceed either of the following limits: 432 tons of material per day or 0.0035 lb PM10/ton of material. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Visible emissions from the railcar unloading shed shall not exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Visible emissions from the exhaust of the dust collector(s) serving the truck unloading and railcar conveyance operations shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E = 3.59 \times P^{0.62}$; P is less than or equal to 30 tons per hour, or $E = 17.37 \times P^{0.16}$; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
12. The baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District NSR Rule] Federally Enforceable Through Title V Permit
13. The differential pressure gauge reading range shall be established per manufacturer's recommendation at time of start up inspection. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Differential operating pressure shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The baghouse shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District NSR Rule] Federally Enforceable Through Title V Permit
17. Replacement bags numbering at least 10% of the total number of bags in the baghouse shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
19. Records of all maintenance of the baghouse, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit

ATTACHMENT C

Emissions Increases

	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
C-705-4-6	0	0	0	0	0
C-705-15-0	0	0	0	0	1,169
TOTAL	0	0	0	0	1,169

ATTACHMENT D

Application

San Joaquin Valley Air Pollution Control District

www.valleyair.org



Permit Application For:

ADMINISTRATIVE AMENDMENT MINOR MODIFICATION SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: JR Simplot Company		
2. MAILING ADDRESS:		
STREET/P.O. BOX: P.O. Box 128		
CITY: Helm	STATE: California	9-DIGIT: 93627 ZIP CODE: 93234
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED:		INSTALLATION DATE: No installation is necessary for this modification.
STREET: 12688 S. Colorado Ave CITY: Helm		
South ¼ SECTION 15 TOWNSHIP 16S RANGE 17E		
4. GENERAL NATURE OF BUSINESS: Fertilizer Manufacturing		
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary)		
C- 705-4-6		
Equipment Description : CALCIUM AMMONIUM NITRATE (CAN-17) PLANT WITH 100 TON LIMESTONE BIN SERVED BY FLEX KLEEN GJ-115 BAGHOUSE, SCREW CONVEYOR, DISSOLVER, NEUTRALIZER, 2 SCRUBBERS, SCRUBBER TANK, ENTRAINMENT SEPARATOR, 4 SETTLING TANKS, 2 STORAGE TANKS, SLUDGE TANK AND ASSOCIATED PUMPS.		
Modification: MOVE LIMESTONE BIN AND LIMESTONE TRUCK RECEIVING FROM PERMIT -4 TO PERMIT 15-0		
6. TYPE OR PRINT NAME OF APPLICANT: Frank B. Gaufin		TITLE OF APPLICANT: Production Manager
7. SIGNATURE OF APPLICANT: 	DATE: 5/29/09	PHONE: (559) 866-5681 FAX: (559) 866-1507 EMAIL: Frank.Gaufin@simplot.com

For APCD Use Only:

DATE STAMP	FILING FEE RECEIVED: \$ 17.00 x 3 = \$ 51.00 CHECK#: 00959018 DATE PAID: 6/9/09 PROJECT NO: C-1092746 FACILITY ID: C-705
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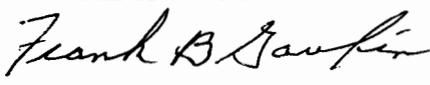
San Joaquin Valley Air Pollution Control District

www.valleyair.org



Permit Application For:

[] ADMINISTRATIVE AMENDMENT [] MINOR MODIFICATION [] SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: JR Simplot Company	
2. MAILING ADDRESS:	
STREET/P.O. BOX: P.O. Box 128	
CITY: Helm	STATE: California
	9-DIGIT: 93627 ZIP CODE: 93234
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED:	
STREET: 12688 S. Colorado Ave	CITY: Helm
South ¼ SECTION 15	TOWNSHIP 16S RANGE 17E
	INSTALLATION DATE: March 2009
4. GENERAL NATURE OF BUSINESS: Fertilizer Manufacturing	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary)	
C-705-15-0 (NEW) EQUIPMENT DESCRIPTION: LIMESTONE RECEIVING OPERATION CONSISTING OF A TRUCK UNLOADING SYSTEM WITH A 100 TON LIMESTONE BIN SERVED BY A SMOOTH MODEL 60BV36 BAGHOUSE AND RAILCAR UNLOADING SYSTEM WITH A COVERED (2 WALLS AND CURTAINS ON ENTRANCE/EXIT) LIMESTONE RECEIVING SHED AND UNDERGROUND SCREW HOPPER AND UNDERGROUND SCREW CONVEYOR, AND ENCLOSED BELT CONVEYOR AND ENCLOSED TRANSFER HOPPER AND PNEUMATIC TRANSFER CONVEYOR AND SILO SERVED BY FLEX-KLEEN MODEL 84-WUD-48-III BAGHOUSE.	
6. TYPE OR PRINT NAME OF APPLICANT: Frank B. Gaufin	TITLE OF APPLICANT: Production Manager
7. SIGNATURE OF APPLICANT: 	DATE: 5/29/09
	PHONE: (559) 866-5681 FAX: (559) 866-1507 EMAIL: Frank.Gaufin@simplot.com

For APCD Use Only:

DATE STAMP	FILING FEE RECEIVED: \$ 17,00 x 3 = \$ 51.00 CHECK#: 00959018 DATE PAID: 6/9/09 PROJECT NO: C-1092746 FACILITY ID: C-705
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Received

JUN 09 2009

Permits Svc
SJVAPCD

San Joaquin Valley Unified Air Pollution Control District

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE
 MINOR PERMIT MODIFICATION AMENDMENT

COMPANY NAME: J.R. Simplot Company	FACILITY ID: C-705
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: J.R. Simplot Co.	
3. Agent to the Owner:	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):

- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:

Frank B. Gaufin

Signature of Responsible Official

5/29/09

Date

Frank B. Gaufin

Name of Responsible Official (please print)

Production Manager

Title of Responsible Official (please print)

ATTACHMENT E

Previous Title V Operating Permit No.

C-705-4-5

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-705-4-5

EXPIRATION DATE: 11/30/2014

EQUIPMENT DESCRIPTION:

CALCIUM AMMONIUM NITRATE (CAN-17) PLANT WITH 100 TON LIMESTONE STORAGE BIN SERVED BY FLEX KLEEN GJ-115 BAGHOUSE, SCREW CONVEYOR, DISSOLVER, NEUTRALIZER, 2 SCRUBBERS, SCRUBBER TANK, ENTRAINMENT SEPARATOR, 4 SETTLING TANKS, 2 STORAGE TANKS, SLUDGE TANK AND ASSOCIATED PUMPS

PERMIT UNIT REQUIREMENTS

1. Production rate shall be limited to 500 tons/day of liquid fertilizer solution. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Emissions from limestone storage silo baghouse shall not exceed 0.02 gr/scf. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Emissions from CAN-17 process shall not exceed any of the following: PM10: 0.004 lb/ton; ammonia: 0.0005 lb/ton; or nitric acid: 0.0039 lb/ton. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Scrubber sprays and/or nozzles shall be maintained in optimum working condition. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Fan air pressure shall be maintained in the range of 9 to 10" w.c. to sufficiently pull fumes from the dissolver and neutralizer to the primary scrubber. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Primary scrubber shall be equipped with a manometer to measure the relative gauge pressure inside the vessel. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Daily records of liquid fertilizer solution production shall be maintained on site and shall be made available for District inspection upon request. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
8. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
9. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E = 3.59 \times P^{0.62}$; P is less than or equal to 30 tons per hour, or $E = 17.37 \times P^{0.16}$; P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
10. Permittee shall perform a complete inspection of the baghouse and its components on an annual basis. Dust collector filters shall be inspected thoroughly for tears, scuffs, abrasions, holes, or any evidence of particulate matter breakthrough and shall be replaced as needed. [District Rule 2520, 9.3] Federally Enforceable Through Title V Permit
11. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4] Federally Enforceable Through Title V Permit
12. Visible emissions shall be inspected quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

13. Weekly records of pressure drop across the scrubbers and the flow rate of scrubber liquid shall be maintained and kept on the premises at all times. Operator shall perform weekly visual qualitative check to make sure that the scrubber liquid is adequately maintained. [District Rule 2520, 9.4] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.