



SEP 03 2013

Mr. Mathew Frank  
J R Simplot  
P.O. box 128  
Helm, Ca 93627

**Re: Notice of Minor Title V Permit Modification**  
**District Facility # C-705**  
**Project # C-1112912**

Dear Mr. Frank:

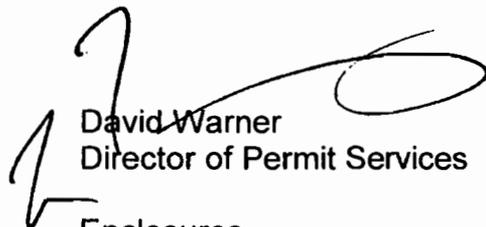
Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued C-705-4-8 into the Title V operating permit. The facility is proposing to modify their permit for the calcium ammonium nitrate plant by modifying the fan air pressure from a range of 9 to 10 inches of water column to a minimum 10 inches of water column. The fan air pressure is used to pull fumes from the operation into the scrubbers.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued C-705-4-8, 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.

If you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Thank you for your cooperation in this matter.

Sincerely,



David Warner  
Director of Permit Services

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email

**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)**  
1980 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: 661-382-5500 FAX: 661-382-5585

# **TITLE V APPLICATION REVIEW**

Minor Modification  
Project #: C-1112912

Engineer: Vanesa Gonzalez  
Date: August 7, 2013

Facility Number: C-705  
Facility Name: J R Simplot  
Mailing Address: 12688 S. Colorado Ave.  
Helm, Ca 93627

Contact Name: Mathew Frank  
Phone: (559) 866-5681 ext 14

Responsible Official: Mathew Frank  
Title: Production Manager

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## **I. PROPOSAL**

J R Simplot Company is proposing a Title V minor permit modification to incorporate the recently issued ATC C-705-4-8 into the Title V operating permit. The ATC is for the modification of the calcium ammonium nitrate plant. The facility is proposing to change the fan air pressure from a range of 9 to 10 inches of water column to a minimum 10 inches of water column.

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**

The facility is located at 12688 S. Colorado in Helm, Ca.

## **III. EQUIPMENT DESCRIPTION**

**C-705-4-9: 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**

#### **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**

Condition 4 of the current permit requirements was modified to change the fan air pressure from between 9 to 10 inches water column to pull fumes from the operation into the scrubber to an air pressure of greater than 10 inches water column. The revised condition is included as condition 4 of the draft permit requirements.

Condition 1 through 3, and 5 through 10 of the permit requirements are included as conditions 1 through 3, and 5 through 10 of the draft permit requirements.

#### **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-705-4-9
- B. Authority to Construct No. C-705-4-8
- C. Application
- D. Previous Title V Operating Permit No. C-705-4-7

# ATTACHMENT A

Proposed Modified Title V Operating Permit No.  
(C-705-4-9)

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-705-4-9

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 at a minimum of 10 inches of water column 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.

# ATTACHMENT B

Authorities to Construct No.  
(C-705-4-8)



## AUTHORITY TO CONSTRUCT

**PERMIT NO:** C-705-4-8

**ISSUANCE DATE:** 04/29/2011

**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 OF CALCIUM AMMONIUM NITRATE (CAN-17) PLANT WITH SCREW CONVEYOR, DISSOLVER, NEUTRALIZER, 2 SCRUBBERS, SCRUBBER TANK, ENTRAINMENT SEPARATOR, 4 SETTLING TANKS, 2 STORAGE TANKS, SLUDGE TANK AND ASSOCIATED PUMPS: CHANGE THE FAN AIR PRESSURE FROM A RANGE OF 9 TO 10 INCHES OF WATER COLUMN TO A MINIMUM 10 INCHES OF WATER COLUMN

### 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 at a minimum of 10 inches of water column 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.

Sayed Sadredin, Executive Director / APCO

DAVID WARNER, Director of Permit Services

C-705-4-8 : Apr 29 2011 2:43PM - OONZALEV : 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
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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

# ATTACHMENT C

Application



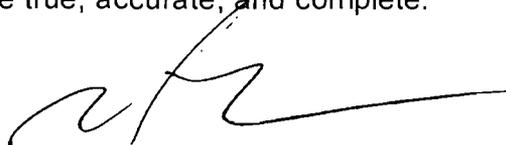
San Joaquin Valley  
Unified Air Pollution Control District

Received  
AUG 31 2011  
SJVUAPCD

Certification of Truth and Accuracy

Company Name: J.R. SIMPLOT	Facility ID: C - 705
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I declare, under penalty of perjury under the laws of the state of California that based on information and belief formed after reasonable inquiry, the statements and information provided in the document are true, accurate, and complete:



Signature of Responsible Official

8/31/11

Date

Matthew S. Frank

Name of Responsible Official (please print)

Production Manager

Title of Responsible Official (please print)

# ATTACHMENT D

Previous Title V Operating Permit No. C-  
705-4-7

# 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

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