



JUN 21 2013

Mr. John Yanak
JR Simplot Company
RT 1100-0023
P.O. Box 9168
Boise, ID 83707

Re: Notice of Minor Title V Permit Modification
District Facility # C-705
Project # C-1131784

Dear Mr. Yanak:

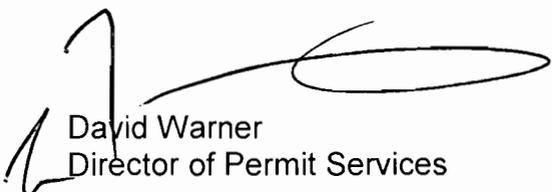
Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued C-705-3-12 into the Title V operating permit. The purpose of the modification is to replace the current tail gas heater (heat exchanger) with a re-tubed heat exchanger.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued ATC C-705-3-12, 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)
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

TITLE V APPLICATION REVIEW

Minor Modification
Project #: C-1131784

Engineer: Sandra Lowe-Leseth
Date: June 19, 2013

Facility Number: C-705
Facility Name: JR Simplot Company
Mailing Address: RT 1100-0023 / P.O. Box 9168 /
Boise, ID 83707

Contact Name: Nathaniel Rutterbush
Phone: 559-829-7517

Responsible Official: John Yanak
Title: CA Manufacturing Manager

I. PROPOSAL

JR Simplot is proposing a Title V minor permit modification to incorporate the recently issued Authority to Construct (ATC) C-705-3-12 into the Title V operating permit. The purpose of the modification is to replace the current tail gas heater (heat exchanger) with a re-tubed heat exchanger.

There are three unimplemented ATCs for this unit: C-705-3-9; C-705-3-10 and C-705-3-11. These ATCs will be implemented at a later date.

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 Avenue in Helm, CA.

III. EQUIPMENT DESCRIPTION

C-705-3-13: NITRIC ACID PLANT CONSISTS OF: ONE AMMONIA VAPORIZER WITH SUPERHEATER, ONE NH₃ TO NO CONVERTER, ONE 50.3 MMBTU/HR WASTE HEAT BOILER, ONE TAIL GAS HEATER, ONE STEAM TURBINE, ONE

AIR COMPRESSOR, ONE NO TO HNO₃ ABSORBER, ONE 6.87 MMBTU/HR NATURAL GAS FIRED CATALYST PREHEATER, ONE NO₂ TO N₂ BUTANE FIRED COMBUSTOR FOR EMISSIONS, AND ONE 17,000 GALLON TANK FOR COLLECTION OF WEAK ACID

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 purpose of the project is to replace the current tail gas heater (which is a shell-and-tube heat exchanger) with a shell-and-tube heat exchanger that has recently had the tubes replaced. The proposed permit and the current permit have no differences in permit conditions because the proposed heat exchanger will operate similar to the current tail gas heater.

There is no emissions increase associated with the project because the proposed modification does not affect throughput or emissions from the process.

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.

ATTACHMENTS

- A. Proposed Modified Title V Operating Permit No. C-705-3-13
- B. Authority to Construct No C-705-3-12
- C. Application
- D. Previous Title V Operating Permit No. C-705-3-8

ATTACHMENT A

Proposed Modified Title V Operating Permit No.
C-705-3-13

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-705-3-13

EXPIRATION DATE: 11/30/2014

EQUIPMENT DESCRIPTION:

NITRIC ACID PLANT CONSISTS OF: ONE AMMONIA VAPORIZER WITH SUPERHEATER, ONE NH₃ TO NO CONVERTER, ONE 50.3 MMBTU/HR WASTE HEAT BOILER, ONE TAIL GAS HEATER, ONE STEAM TURBINE, ONE AIR COMPRESSOR, ONE NO TO HNO₃ ABSORBER, ONE 6.87 MMBTU/HR NATURAL GAS FIRED CATALYST PREHEATER, ONE NO₂ TO N₂ BUTANE FIRED COMBUSTOR FOR EMISSIONS, AND ONE 17,000 GALLON TANK FOR COLLECTION OF WEAK ACID

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. NO₂ emissions shall not exceed 180 ppm three-hour average as determined by continuous monitor and recording equipment certified to 40 CFR 60, Appendix B Performance Specification 2. [District Rules 1080 and 2201, 40 CFR 60.72 (a), and 40 CFR 60.73] Federally Enforceable Through Title V Permit
3. When the plant is operating, the monitors shall be inspected for zero drift and span drift per 40 CFR 60.13d. Reanalyze zero and span gases per 40 CFR 60.13d (July 1, 1977). [40 CFR 60.13 (d) and 60.73 (a)] Federally Enforceable Through Title V Permit
4. Permittee shall record daily production rate and emission data. Records shall be retained and provided to the District upon request. [District Rule 2520 and 40 CFR 60.73 (c)] Federally Enforceable Through Title V Permit
5. Permittee shall submit quarterly reports to the District and EPA, Region IX, no later than 30 days following the end of each calendar quarter, on excess emissions and monitor failures. The periods of excess emissions shall be defined in accordance with 40 CFR 60.73 (e). The report shall comply with all of the requirements of the District rules. [40 CFR 60.73 (e) and District Rule 1080] Federally Enforceable Through Title V Permit
6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
7. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [County Rule 406 (Fresno) and District Rule 4801] Federally Enforceable Through Title V Permit
8. Except during periods of startup, shutdown, and malfunction, any gases discharged from this unit shall not exhibit 10% opacity, or greater. [40 CFR 60.72 (a) and 40 CFR 60.11 (c)] Federally Enforceable Through Title V Permit
9. The owner or operator shall establish a conversion factor for the purpose of converting monitoring data into units of applicable standard (lb/ton of 100% HNO₃ produced). The conversion factor shall be obtained according to procedures and methods specified in 40 CFR 60.73 (b) and shall be reestablished during any performance test under 40 CFR 60.8 or any continuous emission monitoring system performance evaluation under 40 CFR 60.13 (c). [40 CFR 60.73 (b)] Federally Enforceable Through Title V Permit
10. A violation of emission standards of this permit, as shown by the stack-monitoring system, shall be reported to the district within 96 hours. [District Rule 1080] 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.

11. The operator shall notify the district at least 24 hours prior to the shutting down of monitoring equipment. In the event of breakdown of monitoring equipment, the owner or the operator shall notify the district within 1 hour after the breakdown is detected. [District Rule 1080] Federally Enforceable Through Title V Permit
12. The continuous NOx monitor shall meet the applicable performance specification requirements in 40 CFR Part 51, Appendix P, and Part 60, Appendix B or shall meet equivalent specifications established by mutual agreement of District, ARB, and the EPA. [District Rule 1080] Federally Enforceable Through Title V Permit
13. Visible emission inspection shall be performed weekly. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be correct within 24 hours, a visible emissions test using USEPA Method 9 shall be conducted. [District Rule 2520] Federally Enforceable Through Title V Permit
14. Records of inspection shall be maintained, kept, and made available to the District upon request. The record shall at least include equipment description, date and time of inspection, any corrective action taken, and identification of the individual performing an inspection. [District Rule 2520] Federally Enforceable Through Title V Permit

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

DRAFT

ATTACHMENT B

Authority to Construct No.
C-705-3-12



AUTHORITY TO CONSTRUCT

PERMIT NO: C-705-3-12

ISSUANCE DATE: 05/23/2013

LEGAL OWNER OR OPERATOR: J R SIMPLOT COMPANY

MAILING ADDRESS: RT 1100-0023
PO BOX 9168
BOISE, ID 83707

LOCATION: 12688 S COLORADO AVE
HELM, CA 93627

EQUIPMENT DESCRIPTION:

MODIFICATION OF NITRIC ACID PLANT CONSISTS OF: ONE AMMONIA VAPORIZER WITH SUPERHEATER, ONE NH3 TO NO CONVERTER, ONE 50.3 MMBTU/HR WASTE HEAT BOILER, ONE TAIL GAS HEATER, ONE STEAM TURBINE, ONE AIR COMPRESSOR, ONE NO TO HNO3 ABSORBER, ONE 6.87 MMBTU/HR NATURAL GAS FIRED CATALYST PREHEATER, ONE NO2 TO N2 BUTANE FIRED COMBUSTOR FOR EMISSIONS, AND ONE 17,000 GALLON TANK FOR COLLECTION OF WEAK ACID: REPLACE ONE TAIL GAS HEATER WITH A RE-TUBED HEAT EXCHANGER

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. 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
3. NO2 emissions shall not exceed 180 ppm three-hour average as determined by continuous monitor and recording equipment certified to 40 CFR 60, Appendix B Performance Specification 2. [District Rules 1080 and 2201, 40 CFR 60.72 (a), and 40 CFR 60.73] Federally Enforceable Through Title V Permit
4. When the plant is operating, the monitors shall be inspected for zero drift and span drift per 40 CFR 60.13d. Reanalyze zero and span gases per 40 CFR 60.13d (July 1, 1977). [40 CFR 60.13 (d) and 60.73 (a)] Federally Enforceable Through Title V Permit
5. Permittee shall record daily production rate and emission data. Records shall be retained and provided to the District upon request. [District Rule 2520 and 40 CFR 60.73 (c)] 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-705-3-12 - May 23 2013 12:35PM - TOMS - Joint Inspection NOT Required

6. Permittee shall submit quarterly reports to the District and EPA, Region IX, no later than 30 days following the end of each calendar quarter, on excess emissions and monitor failures. The periods of excess emissions shall be defined in accordance with 40 CFR 60.73 (e). The report shall comply with all of the requirements of the District rules. [40 CFR 60.73 (e) and District Rule 1080] 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. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [County Rule 406 (Fresno) and District Rule 4801] Federally Enforceable Through Title V Permit
9. Except during periods of startup, shutdown, and malfunction, any gases discharged from this unit shall not exhibit 10% opacity, or greater. [40 CFR 60.72 (a) and 40 CFR 60.11 (c)] Federally Enforceable Through Title V Permit
10. The owner or operator shall establish a conversion factor for the purpose of converting monitoring data into units of applicable standard (lb/ton of 100% HNO₃ produced). The conversion factor shall be obtained according to procedures and methods specified in 40 CFR 60.73 (b) and shall be reestablished during any performance test under 40 CFR 60.8 or any continuous emission monitoring system performance evaluation under 40 CFR 60.13 (c). [40 CFR 60.73 (b)] Federally Enforceable Through Title V Permit
11. A violation of emission standards of this permit, as shown by the stack-monitoring system, shall be reported to the district within 96 hours. [District Rule 1080] Federally Enforceable Through Title V Permit
12. The operator shall notify the district at least 24 hours prior to the shutting down of monitoring equipment. In the event of breakdown of monitoring equipment, the owner or the operator shall notify the district within 1 hour after the breakdown is detected. [District Rule 1080] Federally Enforceable Through Title V Permit
13. The continuous NO_x monitor shall meet the applicable performance specification requirements in 40 CFR Part 51, Appendix P, and Part 60, Appendix B or shall meet equivalent specifications established by mutual agreement of District, ARB, and the EPA. [District Rule 1080] Federally Enforceable Through Title V Permit
14. Visible emission inspection shall be performed weekly. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be correct within 24 hours, a visible emissions test using USEPA Method 9 shall be conducted. [District Rule 2520] Federally Enforceable Through Title V Permit
15. Records of inspection shall be maintained, kept, and made available to the District upon request. The record shall at least include equipment description, date and time of inspection, any corrective action taken, and identification of the individual performing an inspection. [District Rule 2520] Federally Enforceable Through Title V Permit

ATTACHMENT C

Application

San Joaquin Valley Air Pollution Control District

www.valleyair.org

RECEIVED

MAY 28 2013

Permit Application For:

Permits Services

SJVAPCD

[] ADMINISTRATIVE AMENDMENT MINOR MODIFICATION [] SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: <u>JR SIMPLOT CO</u>	
2. MAILING ADDRESS: STREET/P.O. BOX: <u>12688 S COLORADO AVE / PO BOX 128</u> CITY: <u>HELM</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>93627-0128</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>12688 S COLORADO AVE</u> CITY: <u>HELM, CA</u> <u>SE</u> ¼ SECTION <u>10</u> TOWNSHIP <u>16S</u> RANGE <u>17E</u>	INSTALLATION DATE: <u>JUNE 2013</u>
4. GENERAL NATURE OF BUSINESS: <u>NITROGENOUS FERTILIZER MANUFACTURING</u>	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) <u>MODIFICATION OF PERMIT UNIT C-705-3. REPLACE TAIL GAS HEATER WITH RE-TUBED HEAT EXCHANGER. SJVAPCD PROJECT # C-1131686, ATC C-705-3-12 ISSUED.</u> <u>FULL APPLICATION PACKAGE (COPY) IS ATTACHED.</u>	
6. TYPE OR PRINT NAME OF APPLICANT: <u>NATHANIEL P RUTTERBUSH</u>	TITLE OF APPLICANT: <u>EHS + S SPECIALIST</u>
7. SIGNATURE OF APPLICANT:  DATE: <u>05/28/2013</u>	PHONE: <u>(559) 829-7517</u> FAX: <u>(559) 866-1507</u> EMAIL: <u>nathaniel.rutterbush@simplot.com</u>

For APCD Use Only:

DATE STAMP	FILING FEE RECEIVED: \$ _____ CHECK#: _____
	DATE PAID: _____
	PROJECT NO: <u>C-1131784</u> FACILITY ID: <u>C-705</u>

Central Regional Office • 1990 E. Gettysburg Avenue • Fresno, CA 93726-0244 • (559) 230-5900 • FAX (559) 230-6061

ATTACHMENT D

Previous Title V Operating Permit No
C-705-3-8

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-705-3-8

EXPIRATION DATE: 11/30/2014

EQUIPMENT DESCRIPTION:

NITRIC ACID PLANT CONSISTS OF: ONE AMMONIA VAPORIZER WITH SUPERHEATER, ONE NH₃ TO NO CONVERTER, ONE 50.3 MMBTU/HR WASTE HEAT BOILER, ONE TAIL GAS HEATER, ONE STEAM TURBINE, ONE AIR COMPRESSOR, ONE NO TO HNO₃ ABSORBER, ONE 6.87 MMBTU/HR NATURAL GAS FIRED CATALYST PREHEATER, ONE NO₂ TO N₂ BUTANE FIRED COMBUSTOR FOR EMISSIONS, AND ONE 17,000 GALLON TANK FOR COLLECTION OF WEAK ACID

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 NSR Rule] Federally Enforceable Through Title V Permit
2. NO₂ emissions shall not exceed 180 ppm three-hour average as determined by continuous monitor and recording equipment certified to 40 CFR 60, Appendix B Performance Specification 2. [District NSR Rule, District Rule 1080, 40 CFR 60.72 (a), and 40 CFR 60.73] Federally Enforceable Through Title V Permit
3. When the plant is operating, the monitors shall be inspected for zero drift and span drift per 40 CFR 60.13d. Reanalyze zero and span gases per 40 CFR 60.13d (July 1, 1977). [40 CFR 60.13 (d) and 60.73 (a)] Federally Enforceable Through Title V Permit
4. Permittee shall record daily production rate and emission data. Records shall be retained and provided to the District upon request. [District Rule 2520, 9.4 and 40 CFR 60.73 (c)] Federally Enforceable Through Title V Permit
5. Permittee shall submit quarterly reports to the District and EPA, Region IX, no later than 30 days following the end of each calendar quarter, on excess emissions and monitor failures. The periods of excess emissions shall be defined in accordance with 40 CFR 60.73 (e). The report shall comply with all of the requirements of the District rules. [40 CFR 60.73 (e) and District Rule 1080, 8.0] Federally Enforceable Through Title V Permit
6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
7. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [County Rule 406 (Fresno) and District Rule 4801] Federally Enforceable Through Title V Permit
8. Except during periods of startup, shutdown, and malfunction, any gases discharged from this unit shall not exhibit 10% opacity, or greater. [40 CFR 60.72 (a) and 40 CFR 60.11 (c)] Federally Enforceable Through Title V Permit
9. The owner or operator shall establish a conversion factor for the purpose of converting monitoring data into units of applicable standard (lb/ton of 100% HNO₃ produced). The conversion factor shall be obtained according to procedures and methods specified in 40 CFR 60.73 (b) and shall be reestablished during any performance test under 40 CFR 60.8 or any continuous emission monitoring system performance evaluation under 40 CFR 60.13 (c). [40 CFR 60.73 (b)] Federally Enforceable Through Title V Permit
10. A violation of emission standards of this permit, as shown by the stack-monitoring system, shall be reported to the district within 96 hours. [District Rule 1080, 9.0] 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.

11. The operator shall notify the district at least 24 hours prior to the shutting down of monitoring equipment. In the event of breakdown of monitoring equipment, the owner or the operator shall notify the district within 1 hour after the breakdown is detected. [District Rule 1080, 10.0] Federally Enforceable Through Title V Permit
12. The continuous NO_x monitor shall meet the applicable performance specification requirements in 40 CFR Part 51, Appendix P, and Part 60, Appendix B or shall meet equivalent specifications established by mutual agreement of District, ARB, and the EPA. [District Rule 1080, 6.5] Federally Enforceable Through Title V Permit
13. Visible emission inspection shall be performed weekly. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be correct within 24 hours, a visible emissions test using USEPA Method 9 shall be conducted. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
14. Records of inspection shall be maintained, kept, and made available to the District upon request. The record shall at least include equipment description, date and time of inspection, any corrective action taken, and identification of the individual performing an inspection. [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.