



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

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

Dirk Kempthorne, Governor  
Toni Hardesty, Director

February 9, 2006

**Certified Mail No. 7005 1160 0000 1550 0832**

Larry Simmons, President  
Soda Springs Phosphate, Inc.  
720 East Industrial Place  
Soda Springs, Idaho 83276

RE: Facility ID No. 029-00008, Soda Springs Phosphate, Inc., Soda Springs  
Final Permit to Construct

Dear Mr. Simmons:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct No. P-030301 for the Soda Springs Phosphate, Inc. facility located near Soda Springs, in accordance with IDAPA 58.01.01.200 through 228, *Rules for the Control of Air Pollution in Idaho (Rules)*.

The enclosed Permit to Construct is based on the information contained in your permit application and on the relevant comments received during the public comment period. This permit is effective immediately and supersedes the previous permit issued on August 21, 2000, the terms and conditions of which no longer apply. This permit does not release Soda Springs Phosphate from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

A representative of the Pocatello Regional Office will contact you regarding a meeting with DEQ to discuss the permit terms and requirements. DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to call Dan Pitman at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Martin Bauer, Administrator  
Air Quality Division

MB/DP/sd

Permit No. P-030301

Enclosure



**Air Quality  
PERMIT TO CONSTRUCT**

**State of Idaho  
Department of Environmental Quality**

**PERMIT NO.:** P-030301

**FACILITY ID NO.:** 029-00008

**AQCR:** 061

**CLASS:** SM

**SIC:** 2819

**ZONE:** 11

**UTM COORDINATE (km):** 452.3 , 4724.8

**1. PERMITTEE**  
Soda Springs Phosphate, Inc.

**2. PROJECT**  
Granulation Plant

**3. MAILING ADDRESS**  
720 East Industrial Place

**CITY**  
Soda Springs

**STATE**  
ID

**ZIP**  
83276

**4. FACILITY CONTACT**  
Larry Simmons

**TITLE**  
President

**TELEPHONE**  
(208) 547-3494

**5. RESPONSIBLE OFFICIAL**  
Larry Simmons

**TITLE**  
President

**TELEPHONE**  
(208) 547-3494

**6. EXACT PLANT LOCATION**  
720 East Industrial Place, North Side of Soda Springs, ID

**COUNTY**  
Caribou

**7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**  
Granulation of Phosphate Ore and Gypsum for Organic Farming Application

**8. PERMIT AUTHORITY GENERAL CONDITIONS**

This permit is issued according to IDAPA 58.01.01.200, Rules for the Control of Air Pollution in Idaho, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed or modified by this permit.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the Department of Environmental Quality (DEQ) or its officers, agents, or employees, assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment.

This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented with its application. Changes of design or equipment may require DEQ approval pursuant to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200, et seq.

**TONI HARDESTY, DIRECTOR**  
**DEPARTMENT OF ENVIRONMENTAL QUALITY**

**DATE ISSUED:** February 9, 2006

## Table of Contents

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURES.....	3
1. PERMIT TO CONSTRUCT SCOPE .....	4
2. FACILITY-WIDE CONDITIONS .....	5
3. GRANULATION / DRYER.....	8
4. MISCELLANEOUS PROCESSES .....	12
5. SUMMARY OF EMISSION RATE LIMITS .....	13
6. PERMIT TO CONSTRUCT GENERAL PROVISIONS.....	14

## Acronyms, Units, and Chemical Nomenclatures

AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
CFR	Code of Federal Regulations
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	Environmental Protection Agency
gr	grain (1 lb = 7,000 grains)
gr/dscf	grains per dry standard cubic feet
IDAPA	A numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
lb	pound
NO <sub>x</sub>	nitrogen oxides
O&M	operations and maintenance manual
PM	Particulate Matter
PM <sub>10</sub>	Particulate Matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	Permit to Construct
<i>Rules</i>	<i>Rules for the Control of Air Pollution in Idaho</i>
SIC	Standard Industrial Classification
SM	synthetic minor
T/yr	Tons per year
UTM	Universal Transverse Mercator

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-030301**

<b>Permittee:</b> Soda Springs Phosphate, Inc.	<b>Facility ID No.</b> 029-00008	<b>Date Issued:</b> February 9, 2006
<b>Location:</b> Soda Springs		

**1. PERMIT TO CONSTRUCT SCOPE**

***Purpose***

- 1.1 The purpose of this Permit to Construct (PTC) is to address a change of ownership, and to incorporate the requirements of the Settlement Agreement and Consent Order for the facility.
- 1.2 This PTC replaces Tier II Operating Permit No. 029-00008 issued on August 21, 2000, and it incorporates requirements of the Settlement Agreement signed by DEQ on April 21, 2000 and requirements of the Consent Order signed by DEQ on August 22, 2002.
- 1.3 The following is a chronological history of the permits issued at this facility which are no longer in effect:
  - Tier II Operating Permit No. 029-00008, issued August 21, 2000
  - Tier II Operating Permit No. 029-00008, issued July 23, 1999
  - Tier II Operating Permit No. 029-00008, issued April 12, 1996

***Regulated Sources***

- 1.4 Table 1.1 lists sources of regulated emissions in this permit.

**Table 1.1 SUMMARY OF REGULATED SOURCES**

<b>Permit Section</b>	<b>Source Description</b>	<b>Emissions Control(s)</b>
2	Dryer	Baghouse
3	Product Screening, Conveying, and Milling	Reasonable Control of Fugitive Dust
4	Ore Unloading, Ore Piling, Stockpiles, and Ore Feeding	Reasonable Control of Fugitive Dust
4	Product Loading	Reasonable Control of Fugitive Dust
4	Product Bagging	none

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-030301**

<b>Permittee:</b> Soda Springs Phosphate, Inc.	<b>Facility ID No.</b> 029-00008	<b>Date Issued:</b> February 9, 2006
<b>Location:</b> Soda Springs		

**2. FACILITY-WIDE CONDITIONS**

***Fugitive Emissions***

- 2.1 All reasonable precautions shall be taken to prevent particulate matter (PM) from becoming airborne in accordance with IDAPA 58.01.01.650-651. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of particulate matter. Some of the reasonable precautions include, but are not limited to, the following:
- Application, where practical, of asphalt, oil, water, or environmentally safe chemicals to, or covering of, dirt roads, material stockpiles, and other surfaces which can create dust;
  - Installation and use, where practical, of hoods, fans, and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations;
  - Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts;
  - Paving of roadways and their maintenance in a clean condition, where practical; and
  - Prompt removal of earth or other stored material from streets, where practical.
- 2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.
- 2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.
- 2.4 The permittee shall conduct a weekly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each weekly fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

***Odors***

- 2.5 No person shall allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

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<b>Location:</b> Soda Springs		

- 2.6 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.
- 2.7 The permittee shall operate the facility in accordance with the Operations and Maintenance (O&M) Manual requirements specified in Permit Condition 3.9 to control the odor emissions from the facility.

**Visible Emissions**

- 2.8 The permittee shall not discharge any air pollutant to the atmosphere from any point of emission, including the scrubber stack, for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water and/or NO<sub>x</sub> is the only reason for the failure of the emission to comply with the requirements of this section.
- 2.9 The permittee shall conduct a weekly facility wide inspection of potential sources of visible emissions from stacks vents or other openings, during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see evaluation for each potential source. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. If a Method 9 opacity test is conducted, a minimum of 30 observations shall be recorded. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60 minute period, the permittee shall take all necessary corrective action and report the exceedance in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each weekly visible emissions inspection and each Method 9 opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

**Excess Emissions**

- 2.10 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

**Open Burning**

- 2.11 The permittee shall comply with the requirements of the *Rules for Control of Open Burning*, IDAPA 58.01.01.600-616.

**Performance Testing**

- 2.12 If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-030301**

<b>Permittee:</b> Soda Springs Phosphate, Inc.	<b>Facility ID No.</b> 029-00008	<b>Date Issued:</b> February 9, 2006
<b>Location:</b> Soda Springs		

All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

***Monitoring and Recordkeeping***

- 2.13 The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Records of monitoring information shall include, but not be limited to the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least two years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

***Reports and Certifications***

- 2.14 Any reporting required by this permit, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, notifications of intent to test, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete. Any reporting required by this permit shall be submitted to the following address:

Air Quality Permit Compliance  
Department of Environmental Quality  
Pocatello Regional Office  
444 Hospital Way, #300  
Pocatello, Idaho 83201  
Phone: (208) 236-6160

Fax: (208) 236-6168



**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-030301**

**Permittee:** Soda Springs Phosphate, Inc.  
**Location:** Soda Springs

**Facility ID No.**  
029-00008

**Date Issued:** February 9, 2006

### 3. GRANULATION / DRYER

#### 3.1 Process Description

The ore, gypsum or phosphate, is mixed with water and lignosulfonate in the pug mill. The pug mill mixes these materials together and the mixture falls into the granulator. The granulator rotates at a given speed that has been determined to produce the proper sized granule. The wet granular material then falls into a rotating gas-fired Dryer. The dried material is transferred to a rotating cooler where the product is cooled before going to the screening operation.

#### 3.2 Control System Description

Particulate matter (PM) emissions from the granulation and drying processes are controlled by the Baghouse and then exhausted to the atmosphere through a stack.

**Table 3.1 GRANULATION PROCESS DESCRIPTION**

Emissions Unit(s) / Process(es)	Emissions Control Device	Emissions Point
Dryer	Baghouse	Dryer Stack
Granulator	Reasonable Control of Fugitive Dust	Fugitive Emissions
Pug Mill	Reasonable Control of Fugitive Dust	Fugitive Emissions

#### ***Emissions Limits***

- 3.3 PM and PM with an aerodynamic diameter less than or equal to a nominal ten micrometers (PM<sub>10</sub>) emissions from the Dryer Baghouse stack shall not exceed 2.63 pounds per hour and 11.5 tons per year based on any consecutive 12-month period.
- 3.4 Visible fugitive emissions from the pug mill and the granulator shall not be observed leaving the property boundary exceeding a period or periods aggregating more than three minutes in any 60-minute period. This visual determination is to be conducted using Method 22, as described in 40 CFR Part 60, Appendix A.

#### ***Operating Requirements***

##### 3.5 Feed Material Throughput

The quantity of fertilizer materials fed into the granulation process shall not exceed a maximum of 600 tons per day.

##### 3.6 Dryer Baghouse

The permittee shall install, maintain and operate a Baghouse to control PM emissions from the Dryer. The Baghouse shall be operated at all times that the Dryer is operating.

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-030301**

<b>Permittee:</b> Soda Springs Phosphate, Inc.	<b>Facility ID No.</b> 029-00008	<b>Date Issued:</b> February 9, 2006
<b>Location:</b> Soda Springs		

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

**3.7 Installation of Baghouse Monitoring Equipment**

The permittee shall install, calibrate, maintain, and operate, in accordance with manufacturer's specifications, equipment to continuously measure the pressure differential across the Baghouse.

**3.8 Dryer Fuel**

The Dryer shall be fired exclusively using natural gas.

**3.9 O&M Manual**

Within 60 days after issuance of this permit, the permittee shall have developed an Operations and Maintenance (O&M) Manual which describes the procedures that will be followed to comply with the requirements listed below. This manual shall remain onsite at all times and be made available to DEQ representatives upon request. At a minimum the following items shall be addressed in the manual:

- A description of the procedures that will be followed to control fugitive dust emissions from the facility.
- A description of the procedures that will be followed to control odor emissions from the facility.
- List the manufacturer's recommended minimum and maximum pressure drops for the Baghouse.
- Include an inspection checklist for the Baghouse which lists items that will be periodically inspected while it is operating. Describe how often these operational inspections will be performed. The operational inspections shall be conducted at least once every six weeks or per a DEQ-approved schedule.
- Include an inspection checklist for the Baghouse which lists items that will be inspected when it is taken out of operation and physically opened for inspection. Describe how often these internal inspections are projected to occur. The internal inspections shall be conducted at least once every 18 months or per a DEQ-approved schedule.
- Describe periodic planned maintenance for the Baghouse.
- Detailed description of how any excess emissions events will be handled.
- The contents of the O&M manual shall be based on manufacturers information to the extent this is practical. When the manufacturers information is not used (e.g., information obtained from a performance test), this should be explained in the manual.

The date of each inspection and the type of inspection conducted (e.g., operational or internal) shall be recorded; the records shall remain onsite at all times and shall be made available to DEQ representatives upon request.

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-030301**

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<b>Location:</b> Soda Springs		

**3.10 Training Program**

Within 60 days of issuance of this permit, the permittee shall develop and implement an employee training program covering the operation and maintenance of all emissions control equipment. The training program shall include, but not be limited to, monitoring and record keeping; emissions control equipment operation; and excess emissions response procedures. At least one employee on each shift shall be trained in these procedures.

***Performance Testing Requirements***

3.11 The permittee shall conduct a performance test at least once every five years to measure PM<sub>10</sub> emissions from the Dryer stack. The test shall be conducted to demonstrate compliance with the emission rate limits and opacity standards specified by Permit Conditions 2.8, 3.3, and 3.4. Each performance test conducted to demonstrate compliance, shall be performed in accordance with IDAPA 58.01.01.157, and the following requirements shall be complied with during each test run:

- The PM<sub>10</sub> emission rate from the Dryer stack shall be measured and recorded using EPA Method 5 to demonstrate compliance with Permit Condition 3.3.
- Visible emissions from the Dryer stack shall be observed and recorded using the methods specified in IDAPA 58.01.01.625 to demonstrate compliance with the visible emissions standard.
- An observation shall be conducted and recorded for the presence of visible emissions at the property boundary, from the pug mill and the granulator, to demonstrate compliance with Permit Condition 3.4.
- The granulation process shall be operated at the worst case normal feed material throughput rate during the performance test. A description of how this requirement was met shall be included in the performance test report.
- The following parameters shall be continuously monitored and recorded during each PM<sub>10</sub> performance test on the dryer stack:
  - The quantity of material fed into the granulation process, in tons per hour;
  - pressure drop across the Baghouse;

***Monitoring and Recordkeeping Requirements***

3.12 When the Dryer is operated, the permittee shall monitor and record the following information. The most recent two years' compilation of records shall be kept onsite and shall be made available to DEQ representatives upon request:

- Once each week the pressure drop across the Baghouse.
- Each day the quantity of fertilizer materials fed into the granulation process, in units of tons per day.

**3.13 Training Records**

The permittee shall maintain a record showing the name of each employee who has completed the training program and the date the training was completed. The most recent two years' compilation of records shall be kept onsite and shall be made available to DEQ representatives upon request.

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-030301**

**Permittee:** Soda Springs Phosphate, Inc.

**Facility ID No.**

**Date Issued:** February 9, 2006

**Location:** Soda Springs

029-00008

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-030301**

<b>Permittee:</b> Soda Springs Phosphate, Inc.	<b>Facility ID No.</b> 029-00008	<b>Date Issued:</b> February 9, 2006
<b>Location:</b> Soda Springs		

**4. MISCELLANEOUS PROCESSES**

**4.1 Process Description**

**Product Screening Conveying and Milling:** The cooled material is screened to separate the over and under sized material from the product. The product is transferred to the warehouse. The oversized material is crushed in the hammermill, blended with the undersized material and then fed back to the process with the raw ore.

**Ore Unloading, Ore Piling, Stockpiles, and Ore Feeding:** Raw material is delivered to the facility by dump trucks. Raw material is transferred from stockpiles by a front-end loader to the feed shaker screen that leads to the feeder belt, the feeder bin, the pan feeder, the feed belt and then to the pug mill.

**Product Loading:** Loading of the product is done inside the warehouse by a front-end loader that transfers the product to the loadout shaker, the loadout belt, then to trucks or rail cars. Product is also packaged using a bagging system.

**Table 4.1 MISCELLANEOUS PROCESSES**

<b>Emissions Unit(s) / Process(es)</b>	<b>Emissions Control Device</b>	<b>Emissions Point</b>
Product Screening, Conveying, and Milling	Reasonable Control of Fugitive Dust	Point Source
Ore Unloading, Ore Piling, Stockpiles, and Ore Feeding	Reasonable Control of Fugitive Dust	Fugitive Emissions
Product Loading	Reasonable Control of Fugitive Dust	Fugitive Emissions
Bagging System	none	Bagging System Stack

***Emissions Limits***

4.2 PM and PM<sub>10</sub> emissions from Product Screening, Conveying, and Milling shall not exceed the corresponding emissions limits listed in Table 4.2 of this permit.

**Table 4.2 EMISSIONS LIMITS FOR MISCELLANEOUS PROCESSES<sup>A</sup>**

<b>Source Description</b>	<b>PM</b>		<b>PM<sub>10</sub></b>	
	<b>lb/hr</b>	<b>T/yr<sup>B,C</sup></b>	<b>lb/hr</b>	<b>T/yr<sup>B,C</sup></b>
Product Screening, Conveying, and Milling	5.0	22	1.9	8.3

<sup>A</sup> As determined by a pollutant specific U.S. EPA reference method, or DEQ approved alternative, or as determined by DEQ's emission estimation methods used in this permit analysis.

<sup>B</sup> As determined by multiplying the actual or allowable (if actual is not available) pound per hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

<sup>C</sup> T/yr is tons of emissions per any consecutive 12-month period

4.3 Visible fugitive dust emissions from Product Screening, Conveying, Milling, Ore Unloading, Ore Piling, Stockpiles, Ore Feeding, and Product Loading shall not be observed leaving the property boundary exceeding a period or periods aggregating more than three minutes in any 60-minute period. This visual determination is to be conducted using Method 22, as described in 40 CFR Part 60, Appendix A.

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-030301**

<b>Permittee:</b> Soda Springs Phosphate, Inc.	<b>Facility ID No.</b> 029-00008	<b>Date Issued:</b> February 9, 2006
<b>Location:</b> Soda Springs		

**5. SUMMARY OF EMISSION RATE LIMITS**

Table 5.1 provides a summary of all emission rate limits required by this permit.

**Table 5.1 SUMMARY OF EMISSION RATE LIMITS<sup>A</sup>**

Source Description	PM		PM <sub>10</sub>	
	lb/hr	T/yr <sup>B,C</sup>	lb/hr	T/yr <sup>B,C</sup>
Dryer stack	2.63	11.5	2.63	11.5
Product Screening, Conveying, and Milling	5.0	22	1.9	8.3

<sup>A</sup> As determined by a pollutant specific U.S. EPA reference method, or DEQ approved alternative, or as determined by DEQ's emission estimation methods used in this permit analysis.

<sup>B</sup> As determined by multiplying the actual or allowable (if actual is not available) pound per hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

<sup>C</sup> T/yr is tons of emissions per any consecutive 12-month period

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-030301**

<b>Permittee:</b> Soda Springs Phosphate, Inc.	<b>Facility ID No.</b> 029-00008	<b>Date Issued:</b> February 9, 2006
<b>Location:</b> Soda Springs		

**6. PERMIT TO CONSTRUCT GENERAL PROVISIONS**

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the Rules for the Control of Air Pollution in Idaho. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.
2. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.
3. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
  - To enter, at reasonable times, upon the premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
  - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack compliance testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.
4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
5. The permittee shall notify DEQ, in writing, of the required information for the following events within five working days after occurrence:
  - Initiation of Construction - Date
  - Completion/Cessation of Construction - Date
  - Actual Production Startup - Date
  - Initial Date of Achieving Maximum Production Rate - Production Rate and Date
6. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-030301**

<b>Permittee:</b> Soda Springs Phosphate, Inc.	<b>Facility ID No.</b> 029-00008	<b>Date Issued:</b> February 9, 2006
<b>Location:</b> Soda Springs		

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

7. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.
8. In accordance with IDAPA 58.01.01.123, all documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.