STATE OF IDAHO

PERMIT TO CONSTRUCT
AN AIR POLLUTION
EMITTING SOURCE

PERMIT NUMBER
0420 - 0024

AQCR CLASS SIC
061 A1 1475

ZONE UTM COORDINATE (km)
12 467 0, 4748 5

1. PERMITTEE
P4 Production, LLC

2. PROJECT
Enoc Valley Mine

3. MAILING ADDRESS
PO Box 816

CITY Soda Springs

STATE ID ZIP CODE 83276

4. SITE LOCATION COUNTY NO. OF FULL TIME EMPLOYEES PROPERTY AREA AT SITE (Acresage)
Caribou 65 588

5. PERSON TO CONTACT
Beth Elroy

TITLE Environmental Engineer

TELEPHONE (208) 547-4300

6. EXACT PLANT LOCATION
20 miles Northwest of Soda Springs, Idaho

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS
Chemical Manufacturing Producing Elemental Phosphorus

GENERAL CONDITIONS

This permit is issued according to the Rules for the Control of Air Pollution in Idaho, Section 01.1012, and pertains only to emissions of air contaminants which are regulated by the State of Idaho and to the sources specifically allowed to be constructed 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 local laws, regulations, or ordinances, (d) in no manner implies or suggests that the Department of Health and Welfare, or its officers, agents, or employees, assumes 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 is not transferable to another person, place, piece or set of equipment. This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for two years.

THIS PERMIT HAS BEEN GRANTED ON THE BASIS OF DESIGN INFORMATION PRESENTED WITH ITS APPLICATION. CHANGES OF DESIGN OR EQUIPMENT THAT RESULT IN ANY CHANGE IN THE NATURE OR AMOUNT OF EMISSIONS MUST BE APPROVED IN ADVANCE BY THE DEPARTMENT

DATE: November 25, 1997
(previously issued July 25, 1989)
1. SOURCE DESCRIPTION

1.1 Process Description

Top layers of soil are removed by dozer. Remaining waste rock is removed by drilling, blasting, and bull-dozing activity to expose ore. Ore is loaded via dozer and front-end loader to hopper feeders. From hopper feeders, ore is screened, through a series of grizzlies, vibrators, and a trommel, and conveyed to overhead truck bins. Course material is backfilled into the mine.

Trucks are loaded via the overhead truck bins. Trucks then haul ore to the rock processing plant approximately 20 miles southwest.

1.2 Control Description

Emissions associated from all ore handling are uncontrolled. However, the ore has a moisture content of approximately 12 percent.

Emissions associated with all haul roads and unpaved road areas are controlled using water. Road emissions inside the pit are reduced by an average maximum speed limit of 10 miles per hour and enclosed by the pit walls. Unpaved haul roads outside the pit have an average maximum speed limit of 35 miles per hour.

1.3 Equipment Listing

Equipment used in the ore mining of this facility is as follows:

1.3.1 Dozer
1.3.2 Drilling and blasting equipment
1.3.3 Two grizzly screens
1.3.4 Two vibrating screens
1.3.5 Trommel
1.3.6 Haul trucks
1.3.7 Dump trucks
1.3.8 Scrapers
1.3.9 Hydraulic shovel

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PERMITTEE, PROJECT, AND LOCATION

P4 Production, LLC
Enoch Valley Mine
20 Miles Northeast of Soda Springs, Idaho

SOURCE
Phosphate Ore Strip Mining Facility

1.3.10 Water truck and
1.3.11 Other support equipment

2. EMISSION LIMITS

2.1 Fugitive Emissions

At all times, fugitive emissions shall be reasonably controlled by the following methods, but not limited to the following methods, and as required in IDAPA 16.01.1251 and 16.01.1252 (Rules and Regulations for the Control of Air Pollution in Idaho):

2.1.1 Using water sprays or dust suppressants on surrounding property and all driving surfaces pertaining to this permit.

2.1.2 Revegetation of disturbed areas at the soonest possible season.

2.1.3 Average maximum speed limits shall not exceed ten (10) miles per hour within the mining pit area.

2.1.4 Average maximum speed limits shall not exceed 35 miles per hour on all surrounding unpaved haul roads.

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PERMIT TO CONSTRUCT GENERAL PROVISIONS

A. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission 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.

B. 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 laws for the control of air pollution.

C. The permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:

1. To enter upon the permittee's premises where an emission source is located, or in which any records are required to be kept under the terms and conditions of this permit; and

2. 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 to require stack emission testing in conformance with the excepted EPA procedures when deemed appropriate by the Director.

D. 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.

E. The permittee shall notify the Idaho Air Quality Bureau, in writing, of the required information for the following events within five working days after occurrence:

1. Initiation of Construction - Date
2. Completion/Cessation of Construction - Date
3. Anticipated Production Start-up - Date
4. Actual Production Start-up - Date
5. Maximum Production Rate - Production Rate and Date

F. If emission testing is specified, the permittee must schedule such testing within sixty (60) days after achieving the maximum production rate, but not later than one hundred and eighty (180) days after initial start-up. Such testing must strictly adhere to U.S. Environmental Protection Agency approved methods. Testing procedures and specific time limitations may be modified by the Idaho Air Quality Bureau by prior negotiation if conditions warrant adjustment. The Idaho Air Quality Bureau shall be notified at least fifteen (15) working days prior to the scheduled compliance test. Any records or data generated as a result of such compliance test shall be made available to the Department upon request.

The performance tests will be performed at the maximum production rate. If this maximum rate is not achieved during testing, the allowable production rate will be limited to the production rate attained during testing, or as otherwise specified in this permit.

G. 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.

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