

AIR QUALITY DIVISION
CHAPTER 6, SECTION 3
OPERATING PERMIT

WYOMING DEPARTMENT OF
ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
122 West 25th Street
Cheyenne, Wyoming 82002



PERMIT NO. 3-2-125-1

Issue Date: **July 21, 2014**
Expiration Date: **August 17, 2016**
Effective Date: **July 21, 2014**
Replaces Permit No.: **3-2-125**

In accordance with the provisions of W.S. §35-11-203 through W.S. §35-11-212 and Chapter 6, Section 3 of the Wyoming Air Quality Standards and Regulations,

Simplot Phosphates LLC
Rock Springs Fertilizer Complex
Section 15, Township 18 North, Range 104 West
Sweetwater County, Wyoming

is authorized to operate a stationary source of air contaminants consisting of emission units described in this permit. The units described are subject to the terms and conditions specified in this permit. All terms and conditions of the permit are enforceable by the State of Wyoming. All terms and conditions of the permit, except those designated as not federally enforceable, are enforceable by EPA and citizens under the Act. A copy of this permit shall be kept on-site at the above named facility.

Steven A. Dietrich

Steven A. Dietrich, Administrator
Air Quality Division

7-21-14

Date

Todd Parfitt

Todd Parfitt, Director
Department of Environmental Quality

7/22/14

Date

WAQSR CHAPTER 6, SECTION 3 OPERATING PERMIT

WYOMING DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

TABLE OF CONTENTS

(Modified July 21, 2014)

General Information.....	3
Source Emission Points.....	4
Total Facility Estimated Emissions.....	5
Facility-Specific Permit Conditions.....	6
Facility-Wide Permit Conditions.....	6
Source-Specific Permit Conditions.....	6
Testing Requirements.....	8
Monitoring Requirements.....	9
Recordkeeping Requirements.....	12
Reporting Requirements.....	14
Accidental Release Prevention Requirements.....	17
PSD Applicability Demonstration Requirements.....	17
WAQSR Chapter 5, Section 2 and 40 CFR 60 Subpart Db Requirements.....	20
WAQSR Chapter 5, Section 2 and 40 CFR 60 Subpart H Requirements.....	22
WAQSR Chapter 5, Section 2 and 40 CFR 60 Subpart III Requirements.....	23
WAQSR Chapter 5, Section 2 and 40 CFR 60 Subpart JJJJ Requirements.....	23
40 CFR 61 Subparts A and R Requirements.....	23
WAQSR Chapter 5, Section 3 and 40 CFR 63 Subpart AA Requirements.....	24
WAQSR Chapter 5, Section 3 and 40 CFR 63 Subpart BB Requirements.....	28
WAQSR Chapter 5, Section 3 and 40 CFR 63 Subpart ZZZZ Requirements.....	32
WAQSR Chapter 5, Section 3 and 40 CRF 63 Subpart DDDDD Requirements.....	32
WAQSR Chapter 7, Section 3 Compliance Assurance Monitoring Requirements.....	33
Compliance Certification and Schedule.....	34
Compliance Certification.....	34
Compliance Schedule.....	36
General Permit Conditions.....	37
State Only Permit Conditions.....	42
Summary of Source Emission Limits and Requirements.....	45
Abbreviations.....	54
Definitions.....	55
Appendix A: Reserved	
Appendix B: Reserved	
Appendix C: Compliance Assurance Monitoring Plan	
Appendices D through L: Reserved	
Appendix M: Fluoride Control Techniques	
Appendix N: Permit CT-550A3	

GENERAL INFORMATION
(Modified July 21, 2014)

Company Name: **Simplot Phosphates LLC**

Mailing Address: **515 South Highway 430**

City: **Rock Springs** State: **WY** Zip: **82901**

Plant Name: **Rock Springs Fertilizer Complex**

Plant Location: **Section 15, Township 18 North, Range 104 West, Sweetwater County, WY
(4.5 miles southeast of Rock Springs)**

Plant Mailing Address: **515 South Highway 430**

City: **Rock Springs** State: **WY** Zip: **82901**

Name of Owner: **Simplot Phosphates LLC** Phone: **(307) 382-1532**

Plant Manager/Contact: ***Martin Hunt*** Phone: **(307) 382-1529**

DEQ Air Quality Contact: **District 5 Engineer** Phone: **(307) 332-6755**
510 Meadowview Drive
Lander, WY 82520

SIC Code: **2819, 2874**

Description of Process: **The Rock Springs Fertilizer Complex consists of two sulfuric acid plants, phosphoric acid and superphosphoric acid plants, an ammonium phosphate plant, and miscellaneous product handling and support facilities.**

The plant process begins by oxidizing elemental sulfur which is then absorbed to produce sulfuric acid. Additional sulfuric acid is purchased on the spot market and imported by truck and rail from vendors. Sulfuric acid is then either mixed with the phosphate rock concentrate slurry to produce phosphoric acid (H₃PO₄) or placed in tank storage for future use. The produced phosphoric acid is filtered to remove gypsum and concentrated to 52 percent P₂O₅ by evaporation. A portion of the 52 percent solution (dictated by market demand) is further concentrated to 70 percent P₂O₅ (superphosphoric acid) for producing liquid fertilizer at other off-site locations. The remainder of the 52 percent phosphoric acid is reacted with ammonia to produce granulated ammonium phosphate fertilizers.

SOURCE EMISSION POINTS

(Modified July 21, 2014)

This table may not include any or all insignificant activities at this facility.

SOURCE ID	SOURCE DESCRIPTION	SIZE	CT-6, SEC-2 PERMITS/AWAIVERS
1a/1a'	(Old) Badger Phosphoric Acid Plant ^(a)	1200 TPD P ₂ O ₅	CT-550A, MD-384A, MD-12795
1b	(New) Mustang Phosphoric Acid Plant #2 ^(a)	1200 TPD P ₂ O ₅	MD-384A, MD-12795
2	Superphosphoric Acid Plant (SPA) ^(b)	500 TPD P ₂ O ₅	CT-550A, CT-1043
8a	Auxiliary Boiler	78.6 MMBtu/hr	CT-1043, AP-12908
9a	Lurgi Sulfuric Acid Plant ^(c)	2100 TPD	CT-550A, CT-1043, MD-12795
9b	MEC Sulfuric Acid Plant ^(c)	1520 TPD	MD-1130, MD-12795
10a	Ammonium Phosphate (MAP) Plant ^(d)	75 TPH	CT-550A, CT-550A2, CT-1043, MD-12795
11	Ammonium Phosphate Loadout Fugitives	6000 TPD	MD-12795
12	Ammonium Phosphate Baghouse	6000 TPD	CT-1043, MD-12795
13a	Lime Handling Baghouse (truck)	15 TPH	CT-1043
14	Gypsum Tailings Pond	350 acres max.	AP-7283, MD-12795
15	Plant Road Fugitive Emissions	NA	CT-1043
17	Soda Ash Handling Baghouse	10 TPH	CT-1043
19	Packaged Boiler	350 MMBtu/hr	CT-1043, AP-10171
22	Sulfuric Acid Storage Tank #1	416,447 gallons	None
23	Sulfuric Acid Storage Tank #2	416,447 gallons	None
24	Sulfuric Acid Storage Tank #3	416,447 gallons	None
25	Molten Sulfur Delivery Pit (fugitives)	NA	None
26	Molten Sulfur Storage Tank	NA	None
27	Emergency Boiler Feed Water Pump Engine (diesel)	205 hp	None
28	Cummins M11-P Tailings Booster Pump Engine (diesel)	250 hp	wv-11961
29	John Deere JU6H-UFADNG Clark Emergency Fire Pump Engine (diesel)	183 hp	wv-12054
30	Cummins KTTA50-G2 Emergency Generator Engine (diesel)	1855 hp	AP-2532
34	Cummins GM8.1L emergency generator	186 hp	AP-10572

(a) Fluoride emissions are controlled with Venturi-cyclone fume scrubbers. Sources 1a/1a' and 1b share a common reactor and the combined total phosphoric acid capacity is approximately 1200 TPD P₂O₅.

(b) Fluoride emissions are controlled with Venturicyclone fume scrubbers/demister pads.

(c) SO₂ emissions controlled by dual absorption process. H₂SO₄ mist controlled with candle filters.

(d) Particulate, fluoride and ammonia emissions are controlled by scrubbers with demisters.

TOTAL FACILITY ESTIMATED EMISSIONS

(Modified July 21, 2014)

For informational purposes only. These emissions are not to be assumed as permit limits.

POLLUTANT	EMISSIONS (TPY)
CRITERIA POLLUTANT EMISSIONS	
Particulate Matter	136
PM ₁₀ Particulate Matter	136
Sulfur Dioxide (SO ₂)	2587
Nitrogen Oxides (NO _x)	535
Carbon Monoxide (CO)	248
Volatile Organic Compounds (VOCs)	23
HAZARDOUS AIR POLLUTANT (HAP) EMISSIONS (Total)	
Chlorine (Cl ₂)	46.8
Hydrogen Fluoride (HF)	12
OTHER POLLUTANT EMISSIONS	
Fluoride (F ⁻) also includes HF	41
Ammonia (NH ₃)	438
Sulfuric Acid Mist (weight calculated as H ₂ SO ₄)	85

Emission estimates for total HAPs and NH₃ are from the operating permit application, the other emission estimates are from the application analysis for permit MD-12795.

FACILITY-SPECIFIC PERMIT CONDITIONS

Facility-Wide Permit Conditions

- (F1) **PERMIT SHIELD** [WAQSR Chapter 6, Section 3(k)]
Compliance with the conditions of this permit shall be deemed compliance with any applicable requirements as of the date of permit issuance.
- (F2) **SULFUR DIOXIDE EMISSIONS INVENTORY** [WAQSR Ch 14, Sec 3]
The permittee shall comply with the requirements of WAQSR Ch 14, Sec 3, including estimating SO₂ emissions in accordance with Ch 14 Sec 3(b), and adjusting estimates in accordance with Ch 14 Sec 3(c), if necessary.

Source-Specific Permit Conditions

- (F3) **VISIBLE EMISSIONS** [WAQSR Ch 3, Sec 2; 40 CFR 60 Subpart H] **(Modified July 21, 2014)**
- (a) Visible emissions from the Lurgi and MEC sulfuric acid plants (units 9a and 9b) shall not exceed 10 percent opacity for each unit.
 - (b) Visible emissions from the emergency use diesel fired engines (units 27, 28, 29 and 30) shall not exceed 30 percent opacity except for periods not exceeding ten consecutive seconds.
 - (c) Visible emissions of any contaminant discharged into the atmosphere from any other single emission source shall not exhibit greater than 20 percent opacity except for one period or periods aggregating not more than six minutes in any one hour of not more than 40 percent opacity.
- (F4) **PHOSPHORIC AND SUPERPHOSPHORIC ACID PLANTS (Modified July 21, 2014)**
[WAQSR Ch 6, Sec 2 Permits CT-1043, and MD-384A; 40 CFR 63 Subpart AA]
- (a) **Reserved**
 - (b) Total fluoride emissions from the phosphoric acid plant twin ventilation stacks (unit 1a/1a') shall not exceed 0.01350 lb/ton of equivalent P₂O₅ feed, not to exceed 0.65 lb/hr absolute mass cap. This allowable emission rate shall be a common limit for both GK-1304A and GK-1304B stacks, and shall apply to total emissions measured simultaneously from these two stacks.
 - (c) Total fluoride emissions from the phosphoric acid plant #2 (unit 1b) shall be limited to 0.01350 lb/ton of equivalent P₂O₅ feed, not to exceed 0.65 lb/hr absolute mass cap.
 - (d) Fluoride emissions from the superphosphoric acid plant (unit 2) shall not exceed 0.010 lb/ton of P₂O₅ feed or 0.18 lb/hr.
 - (e) **Reserved**
- (F5) **AUXILIARY BOILER** [WAQSR Ch 6, Sec 2 Permit CT-1043]
Emissions from the auxiliary boiler (unit 8a) shall not exceed the following:
- (a) 0.55 lb/hr particulate
 - (b) 0.07 lb/hr SO₂
 - (c) 20.02 lb/hr NO_x
 - (d) 1.87 lb/hr CO
- (F6) **SULFURIC ACID PLANTS** [WAQSR Ch 6, Sec 2 Permits CT-1043 and MD-1130; and 40 CFR 60 Subpart H]
- (a) Emissions from the Lurgi and MEC sulfuric acid plants (units 9a and 9b) shall not exceed the limits specified in Table I.
 - (b) Production from the MEC sulfuric acid plant shall not exceed 1520 TPD of 100 percent sulfuric acid.

Table I. Sulfuric Acid Plants SO ₂ , H ₂ SO ₄ Mist, and NO _x Emission Limits									
Source	SO ₂			NO _x			H ₂ SO ₄ Mist		
	lb/ton ⁽¹⁾	lb/hr	TPY	lb/ton ⁽¹⁾	lb/hr	TPY	lb/ton ⁽¹⁾	lb/hr	TPY
Lurgi Plant (unit 9a)	4.0	316.67			53.53		0.15	11.88	
MEC Plant (unit 9b)	4.0	253.3	1109.6	0.26	16.3	71.3	0.10	6.3	27.7

⁽¹⁾ lbs of pollutant per ton of acid produced expressed as 100 percent H₂SO₄

- (F7) AMMONIUM PHOSPHATE PLANT [WAQSR Ch 6, Sec 2 Permits CT-550A, CT-550A2 and CT-1043; and 40 CFR 63 Subpart BB]
- (a) Emissions from the ammonium phosphate plant (unit 10a) shall not exceed the following:
 - (i) 20.00 lb/hr particulate
 - (ii) 19.88 lb/hr SO₂
 - (iii) 5.84 lb/hr NO_x
 - (iv) For fluoride, 0.060 lb/ton of P₂O₅ feed, and 2.30 lb/hr
 - (v) 1.40 lb/hr CO
 - (vi) 100 lb/hr and 438 TPY of NH₃ (ammonia)
 - (b) The ammonium phosphate plant shall operate at a minimum ammonia recovery efficiency of 98 percent.
 - (c) The sulfur content of the fuel oil used in the ammonium phosphate dryer shall not exceed 0.5 percent.
- (F8) BAGHOUSE-CONTROLLED SOURCES [WAQSR Ch 6, Sec 2 Permit CT-1043]
Particulate emissions from the following units shall not exceed the specified limits.
- (a) For the ammonium phosphate loadout baghouse (unit 12): 0.50 lb/hr
 - (b) For the lime handling baghouse, truck (unit 13a): 0.11 lb/hr
 - (c) For the soda ash handling baghouse (unit 17): 0.10 lb/hr
- (F9) PACKAGED BOILER [WAQSR Ch 6, Sec 2 Permit CT-1043]
- (a) The packaged boiler (unit 19) may operate at an hourly heat input between 122.5 and 350 MMBtu/hr for no more than 1056 hours per year.
 - (b) NO_x emissions from the packaged boiler shall not exceed the following:
 - (i) At firing rates above 122.5 MMBtu/hr: 0.14 lb/MMBtu, not to exceed 49.00 lb/hr at the maximum firing rate of 350 MMBtu/hr, for 1056 hours per year; and
 - (ii) At firing rates at or below 122.5 MMBtu/hr: 0.14 lb/MMBtu, not to exceed 17.20 lb/hr, for the remainder of the year.
 - (c) CO emissions from the packaged boiler shall not exceed 25.90 lb/hr.
- (F10) EMERGENCY ENGINES [WAQSR Ch 6, Sec 2 Waivers AP-2532, AP-10572, wv-11961, wv-12054]
- (a) The John Deere JU6H-UFADNG Clark engine (unit 29) shall be Tier 3 certified, and shall not exceed 50 hours of operation per year; a non-resettable hour meter shall be operated and maintained to record the hours of operation. The Cummins KTTA50-G2 generator engine (unit 30) shall be limited to 250 hours of operation per year; an hour meter shall be operated and maintained to record the hours of operation.
 - (i) The permittee shall operate and maintain the Cummins KTTA50-G2 generator engine in accordance with the manufacturer's or supplier's recommendations.
 - (ii) The permittee shall operate and maintain the John Deere Clark engine and monitoring equipment according to good air pollution control practices at all times, including startup, shutdown, and malfunction.
 - (b) Emissions from the Cummins M11-P (unit 28) and Cummins GM8.1L (unit 34) engines shall not exceed the limits in Table II.
 - (i) The Cummins GM8.1L engine shall not exceed 500 hours of operation per calendar year, and the Cummins M11-P engine shall not exceed 2,000 hours of operation per calendar year. For each engine, a non-resettable hour meter shall be operated and maintained to record the hours of operation.
 - (ii) The permittee shall operate and maintain the Cummins M11-P in accordance with the manufacturer's or supplier's recommendations.

Source	NO _x			CO			VOC		
	g/hp-hr	lb/hr	TPY	g/hp-hr	lb/hr	TPY	g/hp-hr	lb/hr	TPY
Cummins M11-P (unit 28)	5.0	2.7	2.7	2.6	1.4	1.4			
Cummins GM8.1L (unit 34)	7.6	3.1	0.8	19.8	8.1	2.0	0.4	0.2	<0.1

- (F11) TEMPORARY ENGINE REPLACEMENT [WAQSR Ch 6, Sec 3(h)(i)(I)]
- (a) Should an engine break down or require an overhaul, the permittee may bring on site and operate a temporary replacement engine until repairs are made. Permanent replacement of an engine **must** be evaluated by the Division under Ch 6, Sec 2 of WAQSR to determine appropriate permitting action and evaluate the need for additional requirements resulting from the permanent replacement
 - (b) The temporary replacement unit shall be identical or similar to the unit replaced with emission levels at or below those of the unit replaced.
 - (c) The permittee shall notify the Division in writing of such replacement within five working days, provide the date of startup of the replacement engine, and provide a statement regarding the applicability of any New Source Performance Standards (NSPS) in 40 CFR, Part 60 and/or the applicability of any National Emission Standards for Hazardous Air Pollutants (NESHAPs) in 40 CFR, Part 63.

Testing Requirements

- (F12) LURGI AND MEC SULFURIC ACID PLANTS TESTING [WAQSR Ch 6, Sec 3(h)(i)(C)(I)]
For H₂SO₄ mist and NO_x emissions from the Lurgi and the MEC sulfuric acid plants (units 9a and 9b), the permittee shall conduct testing as follows to assess compliance with the limits specified in condition F6.
- (a) For H₂SO₄ mist emissions from the Lurgi and the MEC sulfuric acid plants, the permittee shall test each plant at least once every five years.
 - (i) The methods and procedures specified in 40 CFR 60 Subpart H shall be used to measure acid mist emissions. Acid mist emissions shall be determined in lb/hr and lb/ton of H₂SO₄ produced.
 - (ii) The permittee shall note whether any visible emissions were present during the testing.
 - (b) For NO_x emissions from the Lurgi and the MEC sulfuric acid plants, the permittee shall test each plant at least once each calendar year using the methods as described in condition F14.
 - (c) Testing shall be conducted in accordance with WAQSR Ch 5, Sec 2 (h).
- (F13) PHOSPHORIC/SUPERPHOSPHORIC ACID PLANTS AND AMMONIUM PHOSPHATE PLANT TESTING [WAQSR Ch 6, Sec 3(h)(i)(C)(I)]
- (a) For fluoride emissions from the phosphoric acid plants (units 1a/1a', 1b and 2), the permittee shall perform testing at least once each calendar year as specified under condition P63-AA2 of this permit to assess compliance with the limits specified in condition F4.
 - (b) For particulate, fluoride, ammonia, NO_x, and CO emissions from the ammonium phosphate plant (unit 10a), the permittee shall perform testing as follows to assess compliance with the limits specified in condition F7:
 - (i) For particulate, fluoride, and ammonia emissions, the permittee perform testing at least once each calendar year.
 - (A) For particulate emissions, methods as described in condition F14 shall be used. The permittee shall continuously measure the differential pressure across the scrubber and the liquor flow rate to the scrubber during the testing to verify the validity of the compliance assurance monitoring parameter ranges.
 - (B) For fluoride emissions, the permittee shall perform testing as specified in condition P63-BB2 of this permit.
 - (C) For ammonia emissions, methods as described in condition F14 shall be used. During testing the permittee shall monitor and calculate the percent ammonia recovery.
 - (ii) The permittee shall measure NO_x and CO emissions at least once every five years or every 8,000 hours of operation of the unit, whichever is more frequent, using the methods as described in condition F14.
 - (c) Testing shall be conducted in accordance with WAQSR Chapter 5, Section 2(h).
- (F14) ADDITIONAL EMISSIONS TESTING [W.S. 35-11-110]
- (a) The Division reserves the right to require additional testing as provided under condition G1 of this permit. Should testing be required, test methods found at 40 CFR 60, Appendix A, shall be used as follows:
 - (i) For visible emissions, Method 9 shall be used.
 - (ii) For particulate emissions, Methods 1-4 and 5 shall be used.
 - (iii) For SO₂ and sulfuric acid mist emissions from the sulfuric acid plants (units 9a and 9b), the methods and procedures described in 40 CFR 60 Subpart H shall be used.

- (iv) For SO₂ emissions from other sources, Methods 1-4 and 6 or 6C shall be used.
 - (v) For engines subject to the requirements of 40 CFR 60 Subpart JJJJ, testing for NO_x, CO and VOC emissions shall be conducted as specified in §60.4244.
 - (vi) For other NO_x emissions, Methods 1-4 and 7 or 7E shall be used.
 - (vii) For other CO emissions, Methods 1-4 and 10 shall be used.
 - (viii) For ammonia emissions, Methods 1-4 and 206 shall be used.
 - (ix) For fluoride emissions from the ammonium phosphate plant (unit 10a), the methods and procedures described in 40 CFR 63 Subpart BB shall be used.
 - (x) For fluoride emissions from the phosphoric acid plants and superphosphoric acid plant (units 1a/1a', 1b, and 2), the methods and procedures described in 40 CFR 63 Subpart AA shall be used.
 - (xi) For alternative test methods, or methods used for other pollutants, the approval of the Administrator must be obtained prior to using the test method to measure emissions.
- (b) Unless otherwise specified, testing shall be conducted in accordance with WAQSR Ch 5, Sec 2(h).

Monitoring Requirements

- (F15) **VISIBLE EMISSIONS MONITORING [WAQSR Ch 6, Sec 3(h)(i)(C)(I)] (Modified July 21, 2014)**
- (a) For visible emissions from the phosphoric acid plants (units 1a/1a', and 1b), superphosphoric acid plant (unit 2), and ammonium phosphate plant (unit 10a), and for visible and particulate emissions from the lime handling baghouse (unit 13a), and soda ash handling baghouse (unit 17), the permittee shall conduct monitoring as follows to determine the presence of visible emissions:
 - (i) The permittee shall conduct, at minimum, weekly Method 22-like visual observations of each source listed above, for at least one minute to determine the presence of visible emissions.
 - (ii) The visual observations shall be conducted by a person who is educated on the general procedures for determining the presence of visible emissions but not necessarily certified to perform Method 9 observations.
 - (iii) Observation of visible emissions from any source listed above shall prompt immediate inspection and, if necessary, corrective actions.
 - (b) For periodic monitoring of visible emissions from the auxiliary and packaged boilers (units 8a and 19), and the Cummins GM8.1L emergency engine (unit 34), the permittee shall monitor the type of fuel used to ensure natural gas is the sole fuel used for these units.
 - (c) For visible emissions from the tailings booster pump engine (unit 28) the permittee shall conduct observations at least once per calendar quarter using Method 9 to assess compliance with condition F3(b). The visual observations shall be conducted by personnel certified to perform Method 9 observations. Observation of visible emissions which exceed the limit specified in condition F3(b) shall trigger immediate inspection and, if necessary, corrective actions.
 - (d) Monitoring for visible emissions from the sulfuric acid plants (units 9a and 9b) is described under condition F18. Monitoring for visible emissions from the ammonium phosphate loadout baghouse (unit 12) is described under condition F20.
- (F16) **PHOSPHORIC/SUPERPHOSPHORIC ACID PLANTS AND FLUORIDE MONITORING [WAQSR Ch 6, Sec 3 (h)(i)(C)(I) and Ch 6, Sec 2 Permit CT-550A] (Modified July 21, 2014)**
 For the fluoride emissions from the phosphoric/superphosphoric acid plants (units 1a/1a', 1b and 2), the permittee shall conduct monitoring as follows:
- (a) **Reserved**
 - (b) Annual fluoride emission testing, P₂O₅ feed rate, and continuous scrubber monitoring requirements for the phosphoric acid plants (units 1a/1a', 1b and 2) as indicated under conditions P63-AA2 and P63-AA3.
 - (c) **Reserved**
- (F17) **AUXILIARY BOILER MONITORING [WAQSR Ch 6, Sec 3 (h)(i)(C)(I)]**
 For particulate, SO₂, NO_x, and CO emissions from the auxiliary boiler (unit 8a), the permittee shall conduct monitoring as follows to assess compliance with the limits specified in condition F5:
- (a) For particulate matter and SO₂ emissions, the permittee shall monitor the type of fuel used to ensure natural gas is the sole fuel source for this unit.
 - (b) The permittee shall measure NO_x and CO emissions at least once every five years; or at least once every 8,000 hours of operation of the unit beginning from the issuance date of this permit or the date of the most recent test; whichever is more frequent.

- (i) The permittee shall use the methods described in condition F14.
- (ii) The permittee shall monitor the operating hours of the unit to determine the testing frequency in accordance with this condition.

(F18) LURGI AND MEC SULFURIC ACID PLANT MONITORING [WAQSR Ch 6, Sec 3(h)(i)(C)(I); Ch 6, Sec 2 Permits CT-550A and MD-1130; Ch 7, Sec 3(c)(ii); 40 CFR 60 Subpart H]

For H₂SO₄, visible, SO₂ and NO_x emissions, and acid production from the Lurgi and MEC sulfuric acid plants (units 9a and 9b), the permittee shall conduct monitoring as follows to assess compliance with the limits in conditions F3 and F6:

- (a) For H₂SO₄ emissions from each sulfuric acid plant, the permittee shall adhere to the compliance assurance monitoring (CAM) plan, attached as Appendix C of this permit, and shall conduct monitoring as follows:
 - (i) The permittee shall conduct, at minimum once daily, visual observations of each sulfuric acid plant as indicated in the CAM plan, to determine the presence of visible emissions.
 - (ii) The visual observations shall be conducted by a person who is educated on the general procedures for determining the presence of visible emissions but not necessarily certified to perform Method 9 observations.
 - (iii) An excursion is defined as observation of visible emissions from any unit, and shall prompt immediate inspection and, if necessary, corrective action.
 - (iv) The permittee shall follow all other applicable requirements under conditions CAM-1 through CAM-4 of this permit.
 - (v) The permittee shall perform testing for acid mist from each sulfuric acid plant at least once every five years as required by condition F12(a), for comparison with the emission limits and to verify the relationship between visible emissions and acid mist emissions.
- (b) For SO₂ emissions from each sulfuric acid plant, the permittee shall continue to calibrate, maintain and operate continuous emissions monitoring systems (CEMs) as described in condition P60-H1.
- (c) For NO_x emissions monitoring from each sulfuric acid plant, the permittee shall perform testing at least once each calendar year as required under condition F12(b).
- (d) The permittee shall measure the daily production of sulfuric acid in the MEC sulfuric acid plant.

(F19) AMMONIUM PHOSPHATE PLANT MONITORING [WAQSR Ch 6, Sec 3 (h)(i)(C)(I); Ch 7, Sec 3(c)(ii)]
 For particulate, SO₂, NO_x, CO, fluoride, and NH₃ emissions from the ammonium phosphate plant (unit 10a), and for the sulfur content of the fuel, the permittee shall conduct monitoring as follows for comparison with the limits specified in condition F7:

- (a) For particulate emissions from the ammonium phosphate plant, the permittee shall adhere to the CAM plan, attached as Appendix C of this permit, and shall conduct monitoring as follows:
 - (i) The permittee shall continuously measure the differential pressure across the scrubber and the liquor flow rate to the scrubber.
 - (ii) An excursion is defined as any parameter measurement outside the indicator ranges specified in the CAM plan, and shall prompt immediate inspection and, if necessary, corrective action.
 - (iii) The permittee shall follow all other applicable requirements under conditions CAM-1 through CAM-4 of this permit.
 - (iv) The permittee shall perform testing for particulate matter emissions at least annually as required by condition F13(b), for comparison with the emission limits, and to verify the relationship between the monitored parameters and particulate matter emissions.
 - (A) The permittee shall measure the CAM indicators during the tests. Following each annual test, the permittee shall evaluate the data from the test, together with data from previous testing, to determine if the indicator ranges in the CAM plan should be revised.
- (b) In the event of fuel oil firing in the ammonium phosphate dryer, the permittee shall monitor the sulfur content of the fuel oil fired to assess compliance with the limit in condition F7(c), and calculate SO₂ emissions to assess compliance with the limit in condition F7(a)(ii).
- (c) The permittee shall measure NO_x and CO emissions at least once every five years or every 8,000 hours of operation as indicated under condition F13(b)(ii). The permittee shall monitor the operating hours of unit 10a to determine the testing frequency in accordance with this condition
- (d) Annual fluoride emissions testing, P₂O₅ feed rate, and continuous scrubber monitoring requirements for the ammonium phosphate plant are indicated under conditions P63-BB2 and P63-BB3 of this permit.

- (e) For NH₃ (ammonia) emissions and percent recovery, the permittee shall perform testing at least once each calendar year as required by condition F13(b).
- (F20) AMMONIUM PHOSPHATE LOADOUT MONITORING [WAQSR Ch 6, Sec 3(h)(i)(C)(I); Ch 7, Sec 3(c)(ii)]
For particulate and visible emissions from the ammonium phosphate loadout baghouse (unit 12), the permittee shall adhere to the CAM plan, attached as Appendix C of this permit, and shall conduct monitoring as follows:
- (a) The permittee shall conduct, at minimum once daily, visual observations of the ammonium phosphate loadout baghouse to determine the presence of visible emissions.
 - (b) The visual observations shall be conducted by a person who is educated on the general procedures for determining the presence of visible emissions but not necessarily certified to perform Method 9 observations.
 - (c) An excursion is defined as observation of visible emissions from any unit, and shall prompt immediate inspection and, if necessary, corrective action.
 - (d) The permittee shall follow all other applicable requirements under conditions CAM-1 through CAM-4.
- (F21) PACKAGED BOILER MONITORING
[WAQSR Ch 6, Sec 3(h)(i)(C)(I); Ch 6, Sec 2 Permit CT-1043; and 40 CFR 60 Subpart Db]
For the heat input limits and NO_x and CO emission limits from the packaged boiler (unit 19), the permittee shall conduct monitoring as follows to assess compliance with the limits specified in condition F9:
- (a) The permittee shall calibrate, operate, and maintain a continuous gas flow meter on the packaged boiler to determine hourly heat input to the boiler and to ensure the hourly heat input limit is not exceeded.
 - (b) For NO_x emissions monitoring, the permittee shall continue to calibrate, maintain and operate a continuous emissions monitoring system (CEMS) as described in condition P60-Db2. The CEMS shall determine and record NO_x emissions in lb/MMBtu and lb/hr.
 - (c) The permittee shall measure CO emissions at least once every five years, or every 8,000 hours of operation of the unit, whichever is more frequent, using the methods described in condition F14. The permittee shall monitor the operating hours of the unit to determine the testing frequency in accordance with this condition.
- (F22) ENGINE AND FLUOSILISIC ACID (FSA) RECOVERY MONITORING [WAQSR Ch 6, Sec 3(h)(i)(C)(I); Ch 6, Sec 2 Waivers AP-2532, AP-10572, AP-2205 and wv-11961] **(Modified July 21, 2014)**
- (a) For the hours of operation limits on the Cummins M11-P (unit 28), Cummins KTTA50-G2 (unit 30), and Cummins GM8.1L (unit 34) engines, the permittee shall monitor the operating hours of each unit by utilizing the hours meters required by condition F10.
 - (b) For NO_x, CO and VOC emissions, as applicable, from the Cummins M11-P (unit 28) and Cummins GM8.1L (unit 34) engines, the permittee shall conduct monitoring as follows to assess compliance with the limits specified in condition F10(b):
 - (i) Testing shall be conducted at least once every three years.
 - (ii) For the Cummins GM8.1L (unit 34), testing for NO_x, CO and VOC emissions shall consist of one 1-hour test following 40 CFR part 60, subpart JJJ §60.4244.
 - (iii) For the Cummins M11-P (unit 28), testing for NO_x and CO shall be conducted in accordance with EPA reference methods in condition F14, or the State of Wyoming's Portable Analyzer Protocol.
 - (iv) The permittee shall notify the Division within 24-hours if units 28 or 34 testing/monitoring shows operation outside the emission limits specified in condition F10(b).
 - (A) The permittee shall repair the engine no later than seven calendar days of such a testing/monitoring event, and shall repair and retest/monitor the engine to demonstrate it has been returned to operation within the limits in condition F10(b).
 - (B) Compliance with this condition regarding repair and retesting/monitoring shall not be deemed to limit the authority of the Division to cite the owner or operator for an exceedance of the emission limits for any testing/monitoring which shows noncompliance.
 - (c) The permittee shall monitor the amount of fluosilic acid (FSA) loaded out of the facility.

Recordkeeping Requirements

- (F23) SULFUR DIOXIDE EMISSIONS INVENTORY RECORDS [WAQSR Ch 14, Sec 3(b)]
- (a) The permittee shall maintain all records used in the calculation of SO₂ emissions for the inventory required by condition F2, including but not limited to the following:
 - (i) Amount of fuel consumed;
 - (ii) Percent sulfur content of fuel and how the content was determined;
 - (iii) Quantity of product produced;
 - (iv) Emissions monitoring data;
 - (v) Operating data; and
 - (vi) How the emissions are calculated, including monitoring/estimation methodology with a demonstration that the selected methodology is acceptable under Ch 14, Sec 3.
 - (b) The permittee shall maintain records of any physical changes to facility operations or equipment, or any other changes (e.g. raw material or feed) that may affect emissions projections of SO₂.
 - (c) The permittee shall retain all records and support information for compliance with this condition and with the reporting requirements of condition F32 at the facility, for a period of **at least ten (10) years** from the date of establishment, or if the record was the basis for an adjustment to the milestone, five years after the date of an implementation plan revision, whichever is longer.
- (F24) VISIBLE EMISSIONS MONITORING RECORDS [WAQSR Ch 6, Sec 3 (h)(i)(C)(II)]
- (a) For the visible emissions monitoring specified under condition F15(a), F18(a) and F20, the permittee shall record, as applicable, the following:
 - (i) The date, place, and time of the observation;
 - (ii) The company or entity that performed the observation;
 - (iii) The observation results;
 - (iv) The operating conditions as they existed at the time of the observation; and
 - (v) Any corrective actions taken upon observing visible emissions from the sources.
 - (b) The permittee shall retain on-site at the facility the records required by this condition for a period of at least five years from the date such records are generated.
- (F25) TESTING RECORDS [WAQSR Ch 6, Sec 3(h)(i)(C)(II)]
- (a) For any testing or monitoring required under conditions F12, F13, F14, F17(b), F19(b)-(e), F21(c), and F22(b), other than Method 9 observations, the permittee shall record, as applicable, the following:
 - (i) The date, place, and time of sampling or measurements;
 - (ii) The date(s) the analyses were performed;
 - (iii) The company or entity that performed the analyses;
 - (iv) The analytical techniques or methods used;
 - (v) The results of such analyses; and
 - (vi) The operating conditions as they existed at the time of sampling or measurement;
 - (vii) For the sulfuric acid plants (units 9a and 9b) testing under condition F12(a), whether visible emissions were present, and the data, assumptions, and calculations used to determine test results in terms of lb/hr and lb/ton of H₂SO₄ produced.
 - (viii) For the ammonium phosphate plant (unit 10a) particulate emissions testing required by condition F13(b), the differential pressure across the scrubber and the liquor flow rate to the scrubber as measured during particulate sampling, and the evaluation of indicator ranges, as required by condition F19(a)(iv).
 - (ix) For the NO_x and CO monitoring required by conditions F17(b), F19(c), and F21(c), the hours of operation of the auxiliary and packaged boilers (units 8a and 19) and the ammonium phosphate plant (unit 10a) since the previous NO_x and CO emissions tests.
 - (x) The permittee shall maintain records of any corrective actions taken.
 - (b) For any Method 9 observations required by the Division under conditions F14 and F15(c), the permittee shall keep field records in accordance with Section 2.2 of Method 9.
 - (c) The permittee shall retain on-site at the facility, the records of each test, measurement, or observation and support information for a period of at least five years from the date such records are generated.

(F26) P₂O₅ FEED RATE RECORDS [WAQSR Ch 6, Sec 2 Permits CT-550A and MD-384A]
(Modified July 21, 2014)

For the monitoring required under condition F16, the permittee shall record the following:

- (a) **Reserved**
- (b) For fluoride emissions and P₂O₅ feed rate monitoring required under condition F16(b), records as indicated under condition P63-AA6 of this permit.
- (c) **Reserved**
- (d) The permittee shall retain on-site at the facility the records required by this condition for a period of at least five years from the date such records are generated.

(F27) LURGI AND MEC SULFURIC ACID PLANTS CAM AND PRODUCTION RECORDS
[WAQSR Ch 6, Sec 3(h)(i)(C)(II); Ch 6, Sec 2 Permits CT-550A and MD-1130]

For emissions monitoring required for the Lurgi and MEC sulfuric acid plants (units 9a and 9b) under condition F18, the permittee shall record the following:

- (a) For the CAM visible emissions monitoring required under condition F18(a), information as specified under condition F24. The permittee shall also maintain records (as applicable) of any written quality improvement plan required pursuant to WAQSR Ch 7, Sec 3(h), any activities undertaken to implement a Quality Improvement Plan (QIP), and other supporting information required to be maintained under WAQSR Ch 7, Sec 3.
- (b) For continuous SO₂ emissions monitoring required by condition F18(b), records in accordance with condition P60-H2 of this permit.
- (c) For NO_x emissions monitoring required by condition F18(c), information as specified under condition F25.
- (d) For the sulfuric acid production monitoring required by condition F18(d), the daily sulfuric acid production rate for the MEC sulfuric acid plant (unit 9b).
- (e) The permittee shall retain on-site at the facility the records required by this condition for a period of at least five years from the date such records are generated.

(F28) AMMONIUM PHOSPHATE PLANT MONITORING AND CAM RECORDS
[WAQSR Ch 6, Sec 3 (h)(i)(C)(II) and Ch 7, Sec 3]

For emissions monitoring required for the ammonium phosphate plant (unit 10a) under condition F19, the permittee shall record the following:

- (a) For the CAM required under condition F19(a):
 - (i) The scrubber liquor flow rate and differential pressure over the scrubber, including each 15-minute block average and each 3-hour rolling average.
 - (ii) Monitor performance data, including any calibration or maintenance.
 - (iii) Particulate matter emissions test results and the evaluation of CAM indicator ranges as specified by condition F19(a)(iv).
 - (iv) The date, time, and duration of any excursions as well as the CAM indicator values during each excursion.
 - (v) Any corrective actions taken upon measurement(s) of indicator values outside the range specified in the CAM plan.
 - (vi) The monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to WAQSR Ch 7, Sec 3(h), any activities undertaken to implement a Quality Improvement Plan (QIP), and other supporting information required to be maintained under WAQSR Ch 7, Sec 3.
- (b) In the event of fuel oil firing in the ammonium phosphate dryer, the sulfur content of the fuel oil fired and the calculations used to estimate SO₂ emissions.
- (c) For the NO_x, CO and ammonia emissions, and ammonia percent recovery monitoring required by condition F19(c) and (e), information as specified under condition F25.
- (d) For fluoride emissions monitoring required under condition F19(d), recordkeeping requirements as indicated under condition P63-BB6 of this permit.
- (e) The permittee shall retain on-site at the facility the records required by this condition for a period of at least five years from the date such records are generated.

- (F29) AMMONIUM PHOSPHATE LOADOUT BAGHOUSE MONITORING AND CAM RECORDS
[WAQSR Ch 6, Sec 3 (h)(i)(C)(II) and Ch 7, Sec 3]
- (a) For the CAM required for the ammonium phosphate loadout baghouse (unit 12) specified under condition F20, the permittee shall record the following:
 - (i) Information from visible emissions monitoring as specified under condition F24.
 - (ii) Any written quality improvement plan required pursuant to WAQSR Ch 7, Sec 3(h), any activities undertaken to implement a Quality Improvement Plan (QIP), and other supporting information required to be maintained under WAQSR Ch 7, Sec 3.
 - (b) The permittee shall retain on-site at the facility the records required by this condition for a period of at least five years from the date such records are generated.
- (F30) PACKAGED BOILER RECORDS [WAQSR Ch 6, Sec 3 (h)(i)(C)(II); Ch 6, Sec 2 Permit CT-1043]
For the monitoring required for the packaged boiler (unit 19) under condition F21, the permittee shall record the following:
- (a) The hourly heat input to the packaged boiler using the continuous gas flow meter required under condition F21(a). The total hours during each calendar quarter and calendar year that the heat input was between 122.5 and 350 MMBtu/hr, to assess compliance with condition F9(a).
 - (b) For NO_x emissions monitoring required under condition F21(b), continuous NO_x emissions monitoring records as described in condition P60-Db3.
 - (i) NO_x emission records shall be in terms of lb/MMBtu and lb/hr.
 - (ii) The monitoring records shall indicate the dates and times during which the boiler was operating above 122.5 MMBtu/hr.
 - (iii) A new 30-day rolling average emission rate in lb/MMBtu shall be calculated and recorded each day the packaged boiler is in operation as the average of all the hourly NO_x emission data for the preceding 30 operating days of the unit.
 - (c) For CO emissions monitoring required by condition F21(c), information specified under condition F25.
 - (d) The permittee shall retain on-site at the facility the records required by this condition, including the boiler hourly heat input log, for a period of at least five years from the date the records are generated.
- (F31) ENGINE RECORDS AND FSA PRODUCTION RECORDS
[Ch 6, Sec 3 (h)(i)(C)(II); Ch 6, Sec 2 Waivers AP-2532, AP-2205, and wv-11961]
- (a) The permittee shall maintain records of all maintenance activities required by condition F10, for the John Deere Clark engine (unit 29), and the Cummins M11-P and Cummins KTTA50-G2 engines (units 28 & 30), including the following:
 - (i) The activity performed;
 - (ii) The date and place the activity was performed;
 - (iii) The company and individual(s) that performed the activity;
 - (iv) The purpose of the activity; and
 - (v) An explanation for any deviation from the manufacturer's or supplier's recommendations
 - (b) For monitoring of operating hours required by condition F22(a), the permittee shall maintain records of the total hours of operation of the John Deere Clark (unit 29), Cummins M11-P (unit 28), Cummins KTTA50-G2 (unit 30), and Cummins GM8.1L (unit 34) engines for each calendar year.
 - (c) For the emissions monitoring for the Cummins M11-P and Cummins GM8.1L engines (units 28 and 34) required by condition F22(b), the permittee shall maintain the information specified under condition F25.
 - (d) For fluosilicic acid (FSA) monitoring required by condition F22(c), the permittee shall keep a log of the amount of FSA loaded at the facility.
 - (e) Records of Tier 3 certification for the John Deere Clark engine (unit 29) shall be maintained.
 - (f) The permittee shall retain on-site at the facility, the records required under this condition for a period of at least five years from the date such records are generated.

Reporting Requirements

- (F32) SULFUR DIOXIDE EMISSIONS INVENTORY REPORTS
[WAQSR Ch 14, Sec 3(b) and (c)] (Modified July 21, 2014)
- (a) The permittee shall report calendar year SO₂ emissions by April 15th of the following year. The inventory shall be submitted in the format specified by the Division.

- (b) Emissions from startup, shutdown, and upset conditions shall be included in the inventory.
 - (c) If the permittee uses a different emission monitoring or calculation method than was used to report SO₂ emissions in 2006, the permittee shall adjust reported SO₂ emissions to be comparable to the emission monitoring or calculation method that was used in 2006. The calculations that are used to make this adjustment shall be included with the annual emission report.
 - (d) The annual reports shall be submitted in accordance with condition G4 of this permit.
- (F33) NOTIFICATIONS & TEST REPORTS [WAQSR Ch 6, Sec 3(h); Ch 6, Sec 2 waivers AP-10572, wv-11961]
- (a) For the testing required for the Cummins M11-P and Cummins GM8.1L engines (units 28 and 34) under condition F22(b), the permittee shall provide the Division at least 15 days prior notice of the test date.
 - (b) The permittee shall report the results of any emissions tests required under conditions F12, F13, F14, F17(b), F19(b)-(e), F21(c), and F22(b), except fluoride emissions testing required under condition F13(b)(i)(B), within 45 days of conducting the tests.
 - (i) However, if either Cummins engine (units 28 and 34) is found to be operating out of compliance, the Division must be notified within 24 hours as indicated under condition F22(b).
 - (c) The requirements for reporting the fluoride emissions testing, referenced in condition F13(b)(i)(B), are described in condition P63-BB7.
 - (d) The reports shall include the applicable information specified under condition F25 and shall be submitted to the Division in accordance with condition G4.
- (F34) MONITORING REPORTS [WAQSR Ch 6, Sec 3 (h)(i)(C)(III); Ch 6, Sec 2 Permits CT-1043 and MD-384A]
(Modified July 21, 2014)
- (a) Within 30 days following the end of each calendar quarter, the permittee shall report to the Division the number of hours the packaged boiler (unit 19) operated between 122.5 and 350 MMBtu/hr for that quarter and calendar year-to-date, as described in condition F30(a).
 - (b) The following shall be reported to the Division by January 31 and July 31 each year for the previous semiannual period:
 - (i) Summary results of the visible emissions monitoring required under condition F15(a). Only monitoring during which visible emissions are observed shall be included in the report with a brief description of any corrective actions taken. If no visible emissions are observed during the reporting period, this shall be stated in the report.
 - (ii) Documentation the auxiliary boiler (unit 8a), the packaged boiler (unit 19), and the Cummins GM8.1L emergency engine (unit 34) are firing natural gas as specified in conditions F15(b) and F17(a).
 - (iii) Summary results of the visible emissions monitoring conducted under condition F15(c), including the date, time, and results of each Method 9 observation. For any observation indicating an exceedance of the limits in condition F3(b), include a description of the operating conditions as they existed at the time of sampling or measurement and any corrective actions taken, as well as the length of time the unit operated in exceedance of opacity limits.
 - (iv) Any exceedances of the daily sulfuric acid production limit in condition F6(b). If the production limit is not exceeded during the reporting period, this shall be stated in the report.
 - (v) Any exceedances of the fuel oil sulfur content limit and/or the SO₂ emission limit for the ammonium phosphate dryer (unit 10a) in condition F7. If the limits are not exceeded during the reporting period, this shall be stated in the report.
 - (c) The following shall be reported to the Division by January 31 each year:
 - (i) **Reserved**
 - (ii) The hours of operation of the Cummins KTTA50-G2 generator engine (unit 30), and the Cummins GM8.1L generator engine (unit 34), during the previous calendar year and any exceedances of the hours of operation limits in condition F10.
 - (iii) For units 8a, 10a, and 19, the hours of operation for each unit since the last emissions test required by conditions F13(b)(ii), F17(b), and F21(c).
 - (d) All instances of deviations from the conditions of this permit must be clearly identified in each report.
 - (e) The reports shall be submitted in accordance with condition G4 of this permit.

- (F35) **ADDITIONAL CAM MONITORING REPORTS [WAQSR Ch 6, Sec 3 (h)(i)(C)(III) and Ch 7, Sec 3 (i)(i)]**
- (a) The results of Compliance Assurance Monitoring (CAM) required under conditions F18, F19 and F20 for units 9a, 9b, 10a, and 12, shall be reported to the Division by January 31 and July 31 each year and shall include the following, as applicable:
 - (i) Summary information on the number, duration, and cause of excursions, and the corrective actions taken;
 - (ii) Summary information on the number, duration, and cause for monitor downtime incidents; and
 - (iii) A description of the action taken to implement a QIP (if required) during the reporting period as specified in Chapter 7, Section 3 (h). Upon completion of a QIP, the permittee shall include in the next summary report documentation that the implementation of the plan has reduced the likelihood of similar excursions.
 - (b) All instances of deviations from the conditions of this permit must be clearly identified in each report.
 - (c) The reports shall be submitted in accordance with condition G4 of this permit.

(F36) **Reserved (Modified July 21, 2014)**

(F37) **REPORTING EXCESS EMISSIONS & DEVIATIONS FROM PERMIT REQUIREMENTS**

[WAQSR Ch 5, Sec 2(g); Ch 6, Sec 3(h)(i)(C)(III); Ch 6, Sec 2 Permits CT-550A, MD-1130 and CT-1043]

- (a) For the phosphoric and superphosphoric acid plants (units 1a/1a', 1b, and 2), reporting requirements for excess fluoride emissions are described in condition P63-AA8 of this permit.
- (b) For SO₂ emissions from the Lurgi and MEC sulfuric acid plants (units 9a and 9b), the permittee shall follow the reporting requirements described in condition P60-H3 of this permit. Excess emissions for purposes of those reports are defined as the following in addition to those described in condition P60-H3(b):
 - (i) Excess emissions for the Lurgi plant (unit 9a) are defined as any one hour period during which the average SO₂ emissions exceed the 316.67 lb/hr limit specified in condition F6.
 - (ii) Excess emissions for the MEC plant are defined as any one hour period during which the average SO₂ emissions exceed either limit of 253.3 lb/hr, or 4.0 lb/ton of 100 percent acid produced, as specified in condition F6.
- (c) For the ammonium phosphate plant (units 10a), reporting requirements for excess fluoride emissions are described in condition P63-BB8 of this permit.
- (d) For NO_x emissions from the packaged boiler (unit 19), the permittee shall follow the reporting requirements described in condition P60-Db4. Excess emissions for purposes of those reports are defined as the following in addition to those described in condition P60-Db4(b):
 - (i) When operating above 122.5 MMBtu/hr heat input, excess emissions are defined as any one hour period during which the average NO_x emissions exceed 49.00 lb/hr.
 - (ii) When operating at 122.5 MMBtu/hr heat input and below, excess emissions will be defined as any one hour period when the average NO_x emissions exceeds 17.2 lb/hr.
 - (iii) At all operating loads, excess emissions are defined as any 30-day rolling average emission NO_x emission rate above 0.14 lb/MMBtu.
- (e) General reporting requirements are described under the General Conditions of this permit. The Division reserves the right to require reports as provided under condition G1 of this permit.
- (f) Emissions which exceed the limits specified in this permit and which are not reported under a different condition of this permit shall be reported annually with the emission inventory unless specifically superseded by condition G17, condition G19, or other condition(s) of this permit. The probable cause of such exceedance, the duration of the exceedance, the magnitude of the exceedance, and any corrective actions or preventative measures taken shall be included in this annual report. For sources and pollutants which are not continuously monitored, if at any time emissions exceed the limits specified in this permit by 100 percent, or if a single episode of emission limit exceedance spans a period of 24 hours or more, such exceedance shall be reported to the Division within one working day of the exceedance. (Excess emissions due to an emergency shall be reported as specified in condition G17. Excess emissions due to unavoidable equipment malfunction shall be reported as specified in condition G19.)
- (g) Any other deviation from the conditions of this permit shall be reported to the Division in writing within 30 days of the deviation or discovery of the deviation.

(F38) GREENHOUSE GAS REPORTS [W.S. 35-11-110]

The permittee shall submit to the Division a summary of any report(s) required to be submitted to the EPA under 40 CFR Part 98.

- (a) The reports shall be submitted to the Division within 60 days of submission to EPA, in a format as specified by the Division.
- (b) The reports shall be submitted in accordance with condition G4(a)(i) of this permit, to the attention of the Division's Emission Inventory Program. A copy need not be sent to the DEQ Air Quality contact

Accidental Release Prevention Requirements

(F39) ACCIDENTAL RELEASE PREVENTION REQUIREMENTS [40 CFR Part 68]

- (a) The permittee shall meet all requirements of 40 CFR Part 68 as they apply to the facility.
- (b) The permittee shall submit, as part of the annual compliance certification submitted under condition C1 of this permit, a certification statement concerning the facility's compliance with all requirements of 40 CFR Part 68, including the registration and submission of a Risk Management Plan.

PSD (Prevention of Significant Deterioration) Applicability Demonstration Requirements

(F40) PROJECT EMISSION LIMITS [WAQSR Ch 6, Sec 2 Permits/Waivers MD-12795, AP-10171, and AP-12908] (Modified July 21, 2014)

- (a) The permittee shall track actual emissions from the sources listed in Table III, to demonstrate the **440K reliability project described in permit MD-12795, the boiler project described in AP-10171, and the auxiliary boiler project described in waiver AP-12908**, do not result in a major modification under Ch 6, Sec 4 of the WAQSR. Actual emissions shall be tracked as described under condition F41.

Table III: Affected Sources	
Sources Affected by the 440K Reliability Project	
Source ID	Source Description
1a/1a'/1b	P ₂ O ₅ Plants
9a	Lurgi Sulfuric Acid Plant
9b	MEC Sulfuric Acid Plant
10a	Ammonium Phosphate Plant
11	Ammonium Phosphate Loadout
12	Ammonium Phosphate Baghouse
14	Gypsum Tailings Pond
Sources Affected by the Boiler Project	
19	Zurn Package Boiler
Sources Affected by the Auxiliary Boiler Project	
8a	Auxiliary Boiler

- (b) For each project, the sum of the actual emissions, on a calendar year basis, from the sources listed in Table III shall not exceed the corresponding emission levels shown in Table IV:

Table IV: Emission Levels	
Emission Levels for the 440K Reliability Project	
Pollutant	Tons Per Year
PM _{2.5}	56
SO ₂	2002
NO _x	132
CO	105
VOC	40

H ₂ SO ₄	33
Fluorides *	38
Emission Levels for the Boiler Project	
PM _{2.5}	11.0
NO _x	53.3
CO	107.4
Emission Level for the Auxiliary Boiler Project	
NO _x	50

* Does not include hydrogen fluoride (HF)

(F41) PROJECT EMISSIONS MONITORING [WAQSR Ch 6, Sec 2 Permit/Waivers **MD-12795**, AP-10171, and **AP-12908**] (Modified July 21, 2014)

Actual emissions from the sources listed in condition F40(a) shall be determined using the following methodologies, unless an alternate method is approved by the Division.

- (a) For the **440K reliability project** described in permit **MD-12795**:
- (i) For PM_{2.5} emissions, actual emissions from point sources shall be determined using the tested emission rate and operating hours for each source. Fugitive emissions shall be calculated using Division approved factors and control efficiencies
 - (ii) For SO₂ emissions, actual emissions from the Lurgi and MEC plants (units 9a and 9b) shall be determined using the daily average pound per hour emission rate meeting the requirements of Ch 5, Sec 2(j). Calendar year SO₂ emissions shall be determined by multiplying the daily average SO₂ pound per hour emission rate by 24, and summing the daily SO₂ emissions for the calendar year. Actual emissions from the MAP plant (unit 10a) shall be determined using AP-42 emissions factors based on pounds per million standard cubic foot and actual gas firing rate
 - (iii) For NO_x emissions, actual emissions from the Lurgi and MEC plants (units 9a and 9b) and MAP plant (unit 10a) shall be determined using the tested emission rate and operating hours for each source.
 - (iv) For CO emissions, actual emissions from the MAP plant (unit 10a) shall be determined using AP-42 emissions factors based on pounds per million standard cubic foot and actual gas firing rate.
 - (v) For VOC emissions, actual emissions from the MAP plant (unit 10a) shall be determined using AP-42 emissions factors based on pounds per million standard cubic foot and actual gas firing rate.
 - (vi) For H₂SO₄ emissions, actual emissions from the Lurgi and MEC plants (units 9a and 9b) shall be determined using the tested emission rate and operating hours for each source
 - (vii) For fluoride emissions, actual emissions from the phosphoric acid plants (Sources 1a/1a'/1b) shall be determined using the tested emission rate and operating hours for each source. Actual emissions from the MAP plant (unit 10a) shall be determined using the tested emission rate and operating hours for the source. Actual emissions from the gypsum pond are assumed to equal 35 **TPY**.
 - (viii) For each source, the permittee shall include fugitive emissions to the extent quantifiable and emissions associated with startups, shutdowns and malfunctions
- (b) For the boiler project described in AP-10171:
- (i) For NO_x emissions, actual emissions from the package boiler (unit 19) shall be determined using the daily average pound per hour emission rate meeting the requirements of Ch 5, Sec 2(j). Calendar year NO_x emissions shall be determined by multiplying the daily average NO_x pound per hour emission rate by 24, and summing the daily NO_x emissions for the calendar year.
 - (ii) For CO emissions, actual emissions from unit 19 shall be determined using AP-42 emissions factors based on pounds per million standard cubic foot and actual gas firing rate.
 - (iii) For PM_{2.5} emissions, actual emissions from unit 19 shall be determined using AP-42 emissions factors based on pounds per million standard cubic foot and actual gas firing rate.
- (c) For the auxiliary boiler project described in **AP-12908**:
- (i) Actual NO_x emissions from the auxiliary boiler (unit 8a) shall be determined using the most recent tested emission rate for the unit and actual operating hours for the source.

- (F42) PROJECT NOTIFICATION REQUIREMENTS [WAQSR Ch 6, Sec 2 Permit MD-12795]
(Modified July 21, 2014)
- (a) Written notification of the actual date of initial start-up for the **440K reliability project described in MD-12795** is required within 15 days after startup in accordance with Ch 6, Sec 2(i)(ii) of the WAQSR, upon completion of the modifications.
 - (b) **Reserved**
- (F43) PROJECT RECORDKEEPING REQUIREMENTS [WAQSR Ch 6, Sec 2 Permits/Waivers, MD-12795, AP-10171, and AP-12908] **(Modified July 21, 2014)**
The permittee shall monitor emissions for each project in accordance with the requirements of condition F41(a), (b), and (c), and shall calculate and maintain a record of the annual emissions in tons per calendar year. This monitoring and recordkeeping shall begin upon startup of operations for each project.
- (F44) REPORTING REQUIREMENTS [WAQSR Ch 6, Sec 2 Permit/Waivers, MD-12795, AP-10171, and AP-12908] **(Modified July 21, 2014)**
The permittee shall report to the Division, within 60 days after the end of each calendar year, the following project reports:
- (a) Annual total emissions, for each pollutant listed in condition F40(b), for each source affected by the **440K reliability project** listed in F40(a).
 - (b) Annual total emissions, for each pollutant listed in condition F40(b), for each source affected by the **boiler project** listed in F40(a).
 - (c) Annual total **NO_x emissions from the auxiliary boiler (unit 8a)**.
 - (d) If initial startup of equipment after project completion has not yet occurred, that shall be so stated in the report in place of emissions for that project.
 - (e) The annual reports shall reference this permit condition (F44) and shall be submitted to the Division in accordance with condition G4.
- (F45) PROJECT COMPLETION CONDITIONS [WAQSR Ch 6, Sec 2 Permit/Waiver, MD-12795, AP-10171, and AP-12908] **(Modified July 21, 2014)**
- (a) For each project described in condition F40, the requirements of conditions F40 – F44 shall expire at the end of five complete calendar years. The five-year period will start the following calendar year after the notification of startup for each project is submitted to the Division.
 - (b) The records required by these projects shall be maintained for a period of at least five years from the date such records are generated and the records shall be made available to the Division upon request.

**WAQSR CHAPTER 5, SECTION 2 NEW SOURCE PERFORMANCE STANDARDS (NSPS) AND
40 CFR 60 SUBPART Db REQUIREMENTS FOR INDUSTRIAL-COMMERCIAL-INSTITUTIONAL
STEAM GENERATING UNITS**

(Modified July 21, 2014)

The subpart is available at <http://www.gpoaccess.gov/cfr/retrieve.html>, or from the Division upon request.

(P60-Db1) SUBPART Db REQUIREMENTS

[40 CFR 60 Subpart Db; WAQSR Ch 5, Sec 2 and Ch 6 Sec 2 Permit CT-1043]

The permittee shall meet all requirements of 40 CFR 60 Subpart Db and WAQSR Ch 5, Sec 2 as they apply to each steam generating boiler as defined under §60.40b, including the packaged boiler (unit 19).

- (a) The permittee shall meet all applicable standards for NO_x as specified in §60.44b(a)(1). Except as provided under §60.44b(j), compliance is determined on a 30-day rolling average basis. Compliance with the lb/MMBtu NO_x emission limit in condition F9(b) is considered compliance with §60.44b(a)(1)(ii).
- (b) The NO_x standards in Subpart Db apply at all times, including periods of startup, shutdown, and malfunction.

(P60-Db2) COMPLIANCE DETERMINATION, MONITORING, AND GOOD AIR POLLUTION CONTROL PRACTICE [40 CFR 60 Subpart Db §§60.46b and 60.48b; WAQSR Ch 5, Sec 2(h), (i), and (j); and Ch 6, Sec 2 Permit CT-1043]

- (a) At all times, including periods of startup, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate any affected facility, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions.
- (b) Compliance with the NO_x emission standards in Subpart Db shall be determined as required by §60.46b.
 - (i) The permittee shall determine compliance on a continuous basis through the use of a 30-day rolling average emission rate. A new 30-day rolling average emission rate is calculated for each steam generating unit operating day as the average of all of the hourly NO_x emission data for the preceding 30 steam generating unit operating days.
- (c) The permittee shall calibrate, maintain, and operate continuous monitoring systems for emissions from the boiler as described in 40 CFR 60 Subpart Db, WAQSR Ch 5, Sec 2(j), and condition F21(b).
 - (i) The permittee shall calibrate, maintain, and operate a CEMS, and record the output of that system, for measuring the NO_x and oxygen (or carbon dioxide) emissions discharged to the atmosphere. The CEMS shall meet the applicable requirements of §60.48b(b), (c), (d), (e), and (f).
 - (ii) The CEMS shall be operated and data recorded during all periods of operation of the packaged boiler except for CEM breakdowns and repairs. Data is recorded during calibration checks, and zero and span adjustments.
 - (iii) Due to limited operation of the boiler the permittee may, in lieu of the annual relative accuracy test audit, perform the following as allowed under WAQSR Ch 5, Sec 2(j)(ix)(B):
 - (A) Three-point gas calibrations for ppm NO_x each quarter,
 - (B) Two-point gas calibrations for oxygen each quarter, and
 - (C) Quarterly air flow calibrations per the approved quality assurance/quality control plan.

(P60-Db3) RECORDKEEPING [40 CFR 60 Subpart Db §60.49b; WAQSR Ch 5, Sec 2(g)(ii) and (g)(v); and Ch 6, Sec 2 Permit CT-1043]

The permittee shall maintain records as required by WAQSR Ch 5 Sec 2(g), §60.49b, and condition F30(b).

- (a) The permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of the packaged boiler; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.
- (b) The permittee shall record and maintain records regarding fuel use as required by §60.49b(d).
- (c) The permittee shall maintain records as required by the applicable requirements of §60.49b(g) and (p).
- (d) The permittee shall maintain records of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system

performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; reports; and other information required by the P60 conditions of this permit recorded in a permanent form suitable for inspection.

- (c) These records shall be retained on-site at the facility for a period of at least five years from the date such records are generated.

(P60-Db4) EXCESS EMISSIONS AND MONITORING SYSTEM PERFORMANCE REPORTS

[40 CFR 60 Subpart Db §60.49b and WAQSR Ch 5, Sec 2(g)(iii) & (iv)]

The permittee shall submit reports as described in WAQSR Ch 5 Sec 2(g), §60.49b, and condition F37(d).

- (a) The permittee shall submit an excess emissions and monitoring systems performance report (excess emissions are defined in paragraph (b) of this condition) and/or a summary report form (see paragraph (a)(v) of this condition) to the Administrator quarterly. All reports shall be postmarked by the 30th day following the end of each calendar quarter. Written reports of excess emissions shall be in a format approved by the Division and shall include the following information:
- (i) The information described in §60.49b(g).
 - (ii) The magnitude of excess emissions computed in accordance with WAQSR Ch 5, Sec 2 (j)(viii), any conversion factor(s) used, and the date and time of commencement and completion of each time period of excess emissions. The process operating time during the reporting period.
 - (iii) Specific identification of each period of excess emissions that occurs during start ups, shutdowns, malfunctions of the boiler. The nature and cause of any malfunction (if known), the corrective action taken or preventative measures adopted.
 - (iv) The date and time identifying each period during which the continuous monitoring system was inoperative except for zero and span checks and the nature of the system repairs or adjustments.
 - (v) When no excess emissions have occurred or the continuous monitoring system(s) have not been in operative, repaired, or adjusted, such information shall be stated in the report.
 - (vi) One summary report form for each pollutant monitored for the boiler in a format approved by the Division.
 - (A) If the total duration of excess emissions for the reporting period is less than one percent of the total operating time for the reporting period and continuous monitoring system downtime for the reporting period is less than five percent of the total operating time for the reporting period, only the summary report form shall be submitted and the excess emission report described in paragraph (a) of this condition need not be submitted unless requested by the Administrator.
 - (B) If the total duration of excess emissions for the reporting period is one percent or greater of the total operating time for the reporting period or the total continuous monitoring system downtime for the reporting period is five percent or greater of the total operating time for the reporting period, the summary report form and the excess emission report described in paragraph (a) of this condition shall both be submitted.
- (b) For purposes of reporting under this condition, excess emissions are defined as any calculated 30-day rolling average NO_x emission rate, as determined in condition P60-Db2, that exceeds standards for NO_x as specified in §60.44b(a)(1). Excess emissions are further defined in condition F37(d).
- (c) Notwithstanding the frequency of reporting requirements specified in paragraph (a) of this condition, a permittee who is required by an applicable subpart to submit excess emissions and monitoring systems performance reports (and summary reports) on a quarterly (or more frequent) basis may reduce the frequency of reporting for that standard to semiannual as described in WAQSR Ch 5, Sec 2(g)(iv). Any reduction in reporting frequency requires a significant modification to this operating permit pursuant to WAQSR Ch 6, Sec 3(d)(vi)(C).
- (d) The permittee shall submit reports required by the applicable requirements of §60.49b(b), (c), and (q).
- (e) The reports shall be submitted to the Division in accordance with condition G4 of this permit.

WAQSR CHAPTER 5, SECTION 2 NEW SOURCE PERFORMANCE STANDARDS (NSPS)
AND 40 CFR 60 SUBPART H REQUIREMENTS FOR SULFURIC ACID PLANTS

(Modified July 21, 2014)

The subpart is available at <http://www.gpoaccess.gov/cfr/retrieve.html>, or from the Division upon request.

(P60-H1) SUBPART H REQUIREMENTS

[40 CFR 60 Subpart H; WAQSR Ch 5, Sec 2 and Ch 6, Sec 2 Permits CT-550A and MD-1130]

The permittee shall meet all requirements of WAQSR Ch 5, Sec 2 and 40 CFR 60 Subpart H as they apply to each sulfuric acid production unit defined under §60.80, including the Lurgi and MEC sulfuric acid plants (units 9a and 9b).

- (a) The permittee shall meet all standards specified in §60.82 and §60.83. Compliance with the lb/ton SO₂ and acid mist limits in condition F6, and with the opacity limit in condition F3(a), is considered compliance with §60.82 and §60.83.
- (b) The permittee shall calibrate, maintain, and operate a continuous in-stack monitoring system on each sulfuric acid plant (units 9a and 9b) for measuring SO₂ emissions. Each monitoring system shall meet the requirements specified in §60.84 and WAQSR Ch 5 Sec 2(j) and shall determine SO₂ emissions in lb/ton of acid produced and lb/hr.

(P60-H2) RECORDKEEPING [40 CFR 60 Subpart H; WAQSR Ch 5, Sec 2(g)(ii)]

- (a) The permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of the Lurgi and MEC sulfuric acid plants; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.
- (b) The permittee shall maintain records of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; and adjustments and maintenance performed on these systems or devices. The permittee shall also maintain any records required by §60.84.
- (c) All information required by these conditions shall be recorded in a permanent form suitable for inspection and retained on-site at the facility for a period of at least five years from the date such records are generated.

(P60-H3) EXCESS EMISSIONS AND MONITORING SYSTEM PERFORMANCE REPORTS

[WAQSR Ch 5, Sec 2(g)(iii) and (iv); 40 CFR 60 Subpart H]

- (a) The permittee shall submit a Subpart H excess emissions and monitoring systems performance report (excess emissions are defined in paragraph (b) of this condition) to the Administrator quarterly. All reports shall be in a format approved by the Division, and postmarked by the 30th day following the end of each calendar quarter. A separate written report shall be submitted for each sulfuric acid plant, and shall include the following information:
 - (i) The magnitude of excess emissions computed in accordance with WAQSR Chapter 5, Section 2 (j)(viii), any conversion factor(s) used, and the date and time of commencement and completion of each time period of excess emissions. The process operating time during the reporting period.
 - (ii) Specific identification of each period of excess emissions that occurs during start ups, shutdowns, or malfunctions of the Lurgi and MEC sulfuric acid plants. The nature and cause of any malfunction (if known), the corrective action taken or preventative measures adopted.
 - (iii) The date and time identifying each period during which the continuous monitoring system was inoperative except for zero and span checks and the nature of the system repairs or adjustments.
 - (iv) When no excess emissions have occurred or the continuous monitoring system(s) have not been inoperative, repaired, or adjusted, such information shall be stated in the report.
- (b) For the purpose of reporting under §60.7(c), periods of excess emissions shall be all 3-hour periods (or the arithmetic average of three consecutive 1-hour periods) during which the integrated average sulfur dioxide emissions exceed 4 lb/ton of acid produced, production being expressed as 100% sulfuric acid.
- (c) The reports shall be submitted to the Division in accordance with condition G4 of this permit.

(P60-H4) GOOD AIR POLLUTION CONTROL PRACTICE [WAQSR Ch 5, Sec 2 (i)(iv)]

At all times, including periods of startup, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate the Lurgi and MEC sulfuric acid plants including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions.

**WAQSR CHAPTER 5, SECTION 2 NEW SOURCE PERFORMANCE STANDARDS (NSPS) AND
40 CFR 60 SUBPART III REQUIREMENTS
FOR STATIONARY COMPRESSION IGNITION INTERNAL COMBUSTION ENGINES**
(Modified July 21, 2014)

SUBPART III REQUIREMENTS

[40 CFR 60 Subparts A and III; WAQSR Ch 5, Sec 2 and Ch 6, Sec 2 Waivers AP-2532, wv-11961 and wv-12054] As applicable, the permittee shall meet the requirements of 40 CFR 60 Subparts A and III and WAQSR Ch 5, Sec 2, as they apply to stationary compression ignition (CI) internal combustion engines. (As required by condition F11(c), if an engine is replaced or reconstructed, subpart applicability will need to be reevaluated and a statement regarding applicability submitted to the Division.) For the purposes of this subpart, the date that construction commences is the date the engine is ordered by the owner or operator. An affected source is defined at §60.4200.

On April 10, 2014, the emergency boiler feed water pump engine (unit 27), Cummins M11-P tailings booster pump engine (unit 28), and Cummins KTTA50-G2 emergency generator engine (unit 30) were not subject to Subpart III according to information submitted to the Division by the permittee. The John Deere Clark emergency engine (unit 29) must meet the requirements of Subpart ZZZZ by meeting the requirements of 40 CFR 60, Subpart III. However, on April 10, 2014, the John Deere Clark emergency engine (unit 29) had no applicable requirements from Subpart III because of its date of manufacture.

**WAQSR CHAPTER 5, SECTION 2 NEW SOURCE PERFORMANCE STANDARDS (NSPS)
AND 40 CFR 60 SUBPART JJJJ REQUIREMENTS
FOR STATIONARY SPARK IGNITION INTERNAL COMBUSTION ENGINES**
(Modified July 21, 2014)

SUBPART JJJJ REQUIREMENTS [40 CFR 60 Subparts A and JJJJ; WAQSR Ch 5, Sec 2 and Ch 6, Sec 2 Waiver AP-10572] As applicable, the permittee shall meet all requirements of 40 CFR 60 Subparts A and JJJJ and WAQSR Ch 5, Sec 2, as they apply to affected stationary spark ignition (SI) internal combustion engines (ICE). (As required by condition F11(c), if an engine is replaced or reconstructed, subpart applicability will need to be reevaluated and a statement regarding applicability submitted to the Division.) For the purposes of this subpart, the date that construction commences is the date the engine is ordered by the owner or operator. An affected source is defined at §60.4230, including the Cummins GM8.1L emergency generator (unit 34).

**NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAPs)
40 CFR 61 SUBPART R REQUIREMENTS FOR RADON EMISSIONS FROM PHOSPHOGYPSUM STACKS**
(Modified July 21, 2014)

40 CFR 61 SUBPART R REQUIREMENTS [40 CFR 61 Subparts A and R]

The permittee shall meet all requirements of 40 CFR 61 Subparts A and R as they apply to each phosphogypsum stack as defined under §61.200, including the gypsum tailings pond (unit 14).

The subparts are available at <http://www.gpoaccess.gov/cfr/retrieve.html>, or from the Division upon request.

**WAQSR CHAPTER 5, SECTION 3 NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR
POLLUTANTS (NESHAPs) AND 40 CFR 63 SUBPART AA REQUIREMENTS FOR
PHOSPHORIC ACID MANUFACTURING PLANTS**

(Modified July 21, 2014)

The subpart is available at <http://www.gpoaccess.gov/cfr/retrieve.html>, or from the Division upon request.

- (P63-AA1) 40 CFR 63 SUBPART AA REQUIREMENTS [WAQSR Ch 5, Sec 3 and 40 CFR 63 Subpart AA]
The permittee shall meet all requirements of 40 CFR 63 Subpart AA and WAQSR Chapter 5, Section 3 as they apply to phosphoric acid manufacturing plants defined under §63.600. Affected sources include the phosphoric acid plant #1 (unit 1a/1a'), phosphoric acid plant #2 (unit 1b), superphosphoric acid plant (unit 2).
- (a) The permittee shall meet all applicable standards in §§63.602 and 63.603 for existing and new affected facilities by the dates specified in §63.609.
 - (i) Compliance with the lb/ton fluoride emission limits in condition F4 shall be considered compliance with §§63.602 and 63.603 for the phosphoric acid plants (units 1a/1a', and 1b).
 - (ii) Compliance with the lb/ton fluoride emission limits in condition F4 shall be considered compliance with §63.602 for the superphosphoric acid plant (unit 2).
 - (iii) **Reserved**
 - (b) For any wet scrubbing emission control system used on equipment subject to Subpart AA, the permittee shall maintain daily averages of the pressure drop across each scrubber and of the flow rate of the scrubbing liquid to each scrubber within the allowable ranges established pursuant to §63.605(d)(1) or (2).
 - (c) The emission limitations and operating parameter requirements of this condition do not apply during periods of startup, shutdown, or malfunction, provided that the affected source is operated in accordance with condition P60-AA4, §63.6(e)(1)(i), and the Startup, Shutdown, and Malfunction Plan prepared pursuant to condition P60-AA5.
- (P63-AA2) TESTING REQUIREMENTS [40 CFR 63 Subpart AA §63.606 and WAQSR Ch 5, Sec 3(h) and (i)]
- (a) The permittee shall demonstrate initial compliance with the emission standards in condition P63-AA1 using the test methods and procedures in §63.606, and WAQSR Ch 5, Sec 3(i).
 - (b) Performance tests required under §63.606 shall be repeated every calendar year. Testing shall also determine lb/hr fluoride emissions for comparison to the limits in condition F4.
 - (c) Performance testing shall meet all requirements for documentation, quality assurance, and other criteria in §63.606 and WAQSR Ch 5, Sec 3(i).
- (P63-AA3) MONITORING REQUIREMENTS [40 CFR 63 Subpart AA; WAQSR Ch 5, Sec 3(j) and Ch 6, Sec 2 Permit CT-550A]
- (a) For the phosphoric acid plants (units 1a/1a', and 1b) and the superphosphoric acid plant (unit 2), the permittee shall:
 - (i) Calibrate, maintain, and operate a monitoring system which can be used to determine and permanently record the mass flow of phosphorus-bearing feed material to the process. The monitoring system shall have an accuracy of ±5 percent over its operating range. Equivalent P₂O₅ feed rate shall be calculated using the specifications in §63.606(c)(3).
 - (ii) For any wet scrubbing emission control system, the permittee shall calibrate, maintain, and operate the following:
 - (A) A monitoring system which continuously measures and permanently records the pressure drop across each scrubber in the process scrubbing system in 15-minute block averages. The monitoring system shall be certified by the manufacturer to have an accuracy of ±5 percent over its operating range.
 - (B) A monitoring system which continuously measures and permanently records the flow rate of the scrubbing liquid to each scrubber in the process scrubbing system in 15-minute block averages. The monitoring system shall be certified by the manufacturer to have an accuracy of ±5 percent over its operating range.
 - (b) Except for system breakdowns, out-of-control periods, repairs, maintenance periods, calibration checks, and zero (low-level) and high-level calibration drift adjustments, all CMSs (continuous monitoring systems) required by Subpart AA shall be in continuous operation.

- (i) The permittee must keep the necessary parts for routine repairs of the CMS equipment readily available.
 - (ii) Additional CMS requirements are specified in Ch 5 Sec 3(j)(iii)(A-C) and (iv).
 - (c) The permittee shall meet all other applicable monitoring requirements as specified in §63.605 and WAQSR Ch 5, Sec 3(j)(ii), (vi), and (vii).
- (P63-AA4) OPERATION & MAINTENANCE REQUIREMENTS [WAQSR Ch 5, Sec 3(h)(iv)(A)(I) and (II)]
- (a) At all times, including periods of startup, shutdown, and malfunction, the permittee shall operate and maintain the affected sources, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions as required by Ch 5 Sec 3.
 - (b) Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the startup, shutdown, and malfunction plan required in condition P63-AA5 of this permit.
- (P63-AA5) STARTUP, SHUTDOWN, AND MALFUNCTION PLAN [WAQSR Ch 5, Sec 3 (h)(iv)(C)]
- (a) The permittee shall maintain and implement a written startup, shutdown, and malfunction plan (SSMP) that describes, in detail, procedures for operating and maintaining the source during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with Subpart AA. The plan shall identify all routine or otherwise predictable CMS malfunctions.
 - (b) During periods of startup, shutdown, and malfunction, the permittee shall operate and maintain all affected sources (including associated air pollution control equipment) in accordance with the procedures specified in the SSMP developed under paragraph (a) of this condition.
 - (c) When actions taken by the permittee during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) are consistent with the procedures specified in the SSMP, the permittee shall keep records for that event that demonstrate the procedures specified in the plan were followed. These records may take the form of a "checklist," or other effective form of recordkeeping, that confirms conformance with the SSMP for that event.
 - (d) If an action taken by the permittee during a startup, shutdown, or malfunction (including an action taken to correct a malfunction) is not consistent with the procedures specified in the SSMP, the permittee shall record the actions taken for that event.
 - (e) The permittee shall keep the written SSMP on record to be made available for inspection, upon request, by the Administrator for the life of each affected source or until the affected source is no longer subject to the provisions of Chapter 5, Section 3. In addition, if the SSMP is revised, the permittee shall keep previous (i.e., superseded) versions of the SSMP on record, to be made available for inspection, upon request, by the Administrator, for a period of 5 years after each revision to the plan.
 - (f) To satisfy the requirements of this condition to develop a SSMP, the permittee may use their standard operating procedures (SOP) manual, or an Occupational Safety and Health Administration (OSHA) or other plan, provided the alternative plans meet all the requirements of Chapter 5, Section 3 and are made available for inspection when requested by the Administrator.
 - (g) If the SSMP fails to address or inadequately addresses an event that meets the characteristics of a malfunction but was not included in the SSMP at the time the permittee developed the plan, the permittee shall revise the SSMP within 45 days after the event to include detailed procedures for operating and maintaining the source during similar malfunction events and a program of corrective action for similar malfunctions of process or air pollution control equipment.
- (P63-AA6) RECORDKEEPING REQUIREMENTS
[40 CFR 63 Subpart AA and WAQSR Ch 5, Sec 3(l)(ii) and (iii)]
- (a) The permittee shall maintain files of all information (including all reports and notifications) required by Subpart AA and Chapter 5, Section 3 recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained on site at the facility. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.
 - (b) The permittee shall maintain relevant records for each affected source of the following:

- (i) For each phosphoric acid plant (units 1a/1a', and 1b) and the superphosphoric acid plant (unit 2), a daily record of equivalent P₂O₅ feed, determined as described in condition P63-AA3(a)(i);
- (ii) The occurrence and duration of each startup, shutdown, or malfunction of operation (i.e., process equipment);
- (iii) The occurrence and duration of each malfunction of the air pollution control equipment;
- (iv) All maintenance performed on the air pollution control equipment;
- (v) Actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) when such actions are different from the procedures specified in the SSMP;
- (vi) All information necessary to demonstrate conformance with the SSMP when all actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan. (The information needed to demonstrate conformance with the SSMP may be recorded using a "checklist," or some other effective form of recordkeeping, to minimize the recordkeeping burden for conforming events);
- (vii) Each period during which a CMS is malfunctioning or inoperable (including out-of-control periods);
- (viii) All required measurements needed to demonstrate compliance with Subpart AA;
- (ix) All results of performance tests, in units of lb/ton and lb/hr;
- (x) All CMS calibration checks, and all adjustments and maintenance performed on the CMSs;
- (xi) All measurements as may be necessary to determine the conditions of performance tests and performance evaluations;
- (xii) All documentation supporting initial notifications and notifications of compliance status under condition P63-AA7 of this permit.
- (xiii) All records of applicability determination, including supporting analysis;
- (xiv) All other records for CMSs required by Ch 5 Sec 3(l)(iii)(A), (B), (D-I), and (K).
- (xv) All other records required by Subpart AA and Chapter 5, Section 3.

(P63-AA7) NOTIFICATION REQUIREMENTS

[40 CFR 63 Subpart AA §63.607 and WAQSR Ch 5, Sec 3(h), (i), (j), and (k)]

- (a) The permittee shall submit notifications required under this permit condition (P63-AA7), Subpart AA, and Chapter 5, Section 3 to the Administrator and U.S. EPA Region VIII in accordance with condition G4 of this permit.
- (b) The permittee shall notify the Administrator in writing of their intention to conduct any performance test required by condition P63-AA2 at least 60 calendar days before the performance test is scheduled to begin.
- (c) The permittee shall submit a Notification of Compliance Status upon completion of any relevant compliance demonstration activity specified in Subpart AA. This shall include the results in lb/ton and lb/hr of any performance test required under condition P63-AA2, which shall be reported within 60 days of completing the test. The Notification of Compliance Status shall include all information required by Ch 5, Sec 3(k)(viii).
- (d) The permittee shall submit all other notifications as required by 40 CFR Subpart AA and WAQSR Ch 5 Sec 3.

(P63-AA8) REPORTING REQUIREMENTS [40 CFR 63 Subpart AA §§63.602, 63.603, and 63.607; and WAQSR Ch 5, Sec 3(j) and Sec 3(l)(i), (iv), and (v)]

- (a) The permittee shall submit reports required under this permit condition (P63-AA8), Subpart AA, and Chapter 5, Section 3 to the Administrator and U.S. EPA Region VIII in accordance with condition G4.
- (b) As part of the annual compliance certification, the permittee shall certify whether or not any liquid effluent from any wet scrubbing device installed to control emissions from process equipment subject to Subpart AA, has been introduced into any affected evaporative cooling tower.
- (c) The permittee shall submit Subpart AA emissions reports for any exceedance of an operating parameter limit, postmarked or delivered by January 30 and July 30 each year. If exceedances are reported, the permittee shall report quarterly until a request to reduce frequency is approved as described in Ch 5, Sec 3(l)(v). The summary report shall include:

- (i) All exceedances of pressure drop or flow rate limitations specified in P63-AA1(b);
 - (ii) All other information listed in WAQSR Ch 5, Sec 3(l)(v)(C)(VI), except CMS performance reports are not required;
 - (iii) When no exceedances of an operating parameter have occurred, such information shall be included in the report; and
 - (iv) The name, title, and signature of the responsible official who is certifying the accuracy of the report.
- (d) If the total duration of operating parameter exceedances for a reporting period is 1 percent or greater of the total operating time for that reporting period, the permittee shall submit a summary report, as described in paragraph (c) above, and an excess emissions report. The reports shall be postmarked or delivered within 30 days of the end of the calendar quarter and shall include the following:
- (i) Information required by WAQSR Ch 5, Sec 3(l)(iii)(B) and (D) through (I);
 - (ii) The name, title, and signature of the responsible official who is certifying the accuracy of the report.
- (e) Periodic startup, shutdown, and malfunction reports:
- (i) If actions taken by the permittee during a startup, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are consistent with the procedures specified in the source's SSMP, the permittee shall state such information in a startup, shutdown, and malfunction report. Reports shall only be required if a startup, shutdown, or malfunction occurred during the reporting period. The startup, shutdown, and malfunction report shall consist of a letter, containing the name, title, and signature of the responsible official who is certifying its accuracy, which shall be submitted to the Administrator semiannually. The startup, shutdown, and malfunction report shall be delivered or postmarked by the 30th day following the end of each calendar half, and may be submitted simultaneously with the Subpart AA emissions reports.
 - (ii) Immediate startup, shutdown, and malfunction reports. Any time an action taken by a permittee during a startup, shutdown, or malfunction is not consistent with the procedures in the SSMP, the permittee shall make a report of the actions taken for the event within 24 hours, by telephone call or facsimile (FAX) transmission. The immediate report shall be followed by a letter, delivered or postmarked within 7 working days after the end of the event, that contains the name, title, and signature of the responsible official who is certifying its accuracy, explaining the circumstances of the event, the reasons for not following the SSMP, and whether any excess emissions and/or operating parameter exceedances are believed to have occurred.
 - (iii) For those malfunctions and or other events that affect a CMS and are not addressed by the SSMP, the permittee shall send a follow-up report within 2 weeks after commencing actions inconsistent with the plan that either certifies that corrections have been made or includes a corrective action plan and schedule. The permittee shall provide proof that repair parts have been ordered or any other records that would indicate that the delay in making repairs is beyond their control.
- (f) The permittee shall submit all other reports as required by §63.607 and Chapter 5, Section 3.

**WAQSR CHAPTER 5, SECTION 3 NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR
POLLUTANTS (NESHAPs) AND 40 CFR 63 SUBPART BB REQUIREMENTS
FOR PHOSPHATE FERTILIZERS PRODUCTION PLANTS**

(Modified July 21, 2014)

The subpart is available at <http://www.gpoaccess.gov/cfr/retrieve.html>, or from the Division upon request.

- (P63-BB1) 40 CFR 63 SUBPART BB REQUIREMENTS [WAQSR Ch 5, Sec 3 and 40 CFR 63 Subpart BB]
The permittee shall meet all requirements of 40 CFR 63 Subpart BB and WAQSR Chapter 5, Section 3 as they apply to the affected sources described in §63.620. Affected sources include the ammonium phosphate plant (unit 10a) process line (reactor, granulator, dryer, cooler, and screens).
- (a) The permittee shall meet all applicable standards in §§63.622 and 63.623 for existing and new affected sources. Compliance with the lb/ton fluoride emission limits in condition F7 shall be considered compliance with §63.622 for the ammonium phosphate plant (unit 10a).
 - (b) For any wet scrubbing emission control system used on equipment subject to Subpart BB, the permittee shall maintain daily averages of the pressure drop across each scrubber and of the flow rate of the scrubbing liquid to each scrubber within the allowable ranges established pursuant to §63.625(f)(1) or (2).
 - (c) The emission limitations and operating parameter requirements of this condition do not apply during periods of startup, shutdown, or malfunction, provided that the affected source is operated in accordance with condition P60-BB4, §63.6(e)(1)(i), and the Startup, Shutdown, and Malfunction Plan prepared pursuant to condition P60-BB5.
- (P63-BB2) TESTING REQUIREMENTS [40 CFR 63 Subpart BB and WAQSR Ch 5, Sec 3(h) and (i)]
- (a) The permittee shall demonstrate initial compliance with the emission standards in condition P63-BB1 using the test methods and procedures in §63.626, and WAQSR Ch 5, Sec 3(i).
 - (b) Performance tests required under §63.626 shall be repeated every calendar year. Testing shall also determine lb/hr fluoride emissions for comparison to the limit in condition F7.
 - (c) Performance testing shall meet all requirements for documentation, quality assurance, and other criteria in §63.626 and WAQSR Ch 5, Sec 3(i).
- (P63-BB3) MONITORING REQUIREMENTS [40 CFR 63 Subpart BB; WAQSR Ch 5, Sec 3(j) and Ch 6, Sec 2 Permit CT-550A]
- (a) For each affected source, the permittee shall:
 - (i) Calibrate, maintain, and operate a monitoring system which can be used to determine and permanently record the mass flow of phosphorus-bearing feed material to the process. The monitoring system shall have an accuracy of ±5 percent over its operating range. Equivalent P₂O₅ feed rate shall be calculated using the specifications in §63.626(c)(3).
 - (ii) For any wet scrubbing emission control system, the permittee shall calibrate, maintain, and operate the following:
 - (A) A monitoring system which continuously measures and permanently records the pressure drop across each scrubber in the process scrubbing system in 15-minute block averages. The monitoring system shall be certified by the manufacturer to have an accuracy of ±5 percent over its operating range.
 - (B) A monitoring system which continuously measures and permanently records the flow rate of the scrubbing liquid to each scrubber in the process scrubbing system in 15-minute block averages. The monitoring system shall be certified by the manufacturer to have an accuracy of ±5 percent over its operating range.
 - (b) Except for system breakdowns, out-of-control periods, repairs, maintenance periods, calibration checks, and zero (low-level) and high-level calibration drift adjustments, all CMSs (continuous monitoring systems) required by Subpart BB shall be in continuous operation.
 - (i) The permittee must keep the necessary parts for routine repairs of the CMS equipment readily available.
 - (ii) Additional CMS requirements are specified in Ch 5 Sec 3(j)(iii)(A-C) and (iv).
 - (c) The permittee shall meet all other applicable monitoring requirements as specified in §63.625 and WAQSR Ch 5, Sec 3(j)(ii), (vi), and (vii).

- (P63-BB4) OPERATION & MAINTENANCE REQUIREMENTS [WAQSR Ch 5, Sec 3(h)(iv)(A)(I) and (II)]
- (a) At all times, including periods of startup, shutdown, and malfunction, the permittee shall operate and maintain the affected sources, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions as required by Ch 5 Sec 3.
 - (b) Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the startup, shutdown, and malfunction plan required in condition P63-BB5 of this permit.

- (P63-BB5) STARTUP, SHUTDOWN, AND MALFUNCTION PLAN [WAQSR Ch 5, Sec 3 (h)(iv)(C)]
- (a) The permittee shall maintain and implement a written startup, shutdown, and malfunction plan (SSMP) that describes, in detail, procedures for operating and maintaining the source during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with Subpart BB. The plan shall identify all routine or otherwise predictable CMS malfunctions.
 - (b) During periods of startup, shutdown, and malfunction, the permittee shall operate and maintain all affected sources (including associated air pollution control equipment) in accordance with the procedures specified in the SSMP developed under paragraph (a) of this condition.
 - (c) When actions taken by the permittee during a startup, shutdown, or malfunction (including actions taken to correct a malfunction) are consistent with the procedures specified in the SSMP, the permittee shall keep records for that event that demonstrate the procedures specified in the plan were followed. These records may take the form of a checklist," or other effective form of recordkeeping, that confirms conformance with the SSMP for that event.
 - (d) If an action taken by the permittee during a startup, shutdown, or malfunction (including an action taken to correct a malfunction) is not consistent with the procedures specified in the SSMP, the permittee shall record the actions taken for that event.
 - (e) The permittee shall keep the written SSMP on record to be made available for inspection, upon request, by the Administrator for the life of each affected source or until the affected source is no longer subject to the provisions of Chapter 5, Section 3. In addition, if the SSMP is revised, the permittee shall keep previous (i.e., superseded) versions of the SSMP on record, to be made available for inspection, upon request, by the Administrator, for a period of 5 years after each revision to the plan.
 - (f) To satisfy the requirements of this condition to develop a SSMP, the permittee may use their standard operating procedures (SOP) manual, or an Occupational Safety and Health Administration (OSHA) or other plan, provided the alternative plans meet all the requirements of Chapter 5, Section 3 and are made available for inspection when requested by the Administrator.
 - (g) If the SSMP fails to address or inadequately addresses an event that meets the characteristics of a malfunction but was not included in the SSMP at the time the permittee developed the plan, the permittee shall revise the SSMP within 45 days after the event to include detailed procedures for operating and maintaining the source during similar malfunction events and a program of corrective action for similar malfunctions of process or air pollution control equipment.

- (P63-BB6) RECORDKEEPING REQUIREMENTS
[40 CFR 63 Subpart BB and WAQSR Ch 5, Sec 3(l)(ii) and (iii)]
- (a) The permittee shall maintain files of all information (including all reports and notifications) required by Subpart BB and Chapter 5, Section 3 recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained on site at the facility. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.
 - (b) The permittee shall maintain relevant records for each affected source of the following:
 - (i) For the ammonium phosphate plant (unit 10a), a daily record of equivalent P_2O_5 feed, determined as described in condition P63-BB3(a)(i);
 - (ii) The occurrence and duration of each startup, shutdown, or malfunction of operation (i.e., process equipment);
 - (iii) The occurrence and duration of each malfunction of the air pollution control equipment;
 - (iv) All maintenance performed on the air pollution control equipment;

- (v) Actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) when such actions are different from the procedures specified in the SSMP;
- (vi) All information necessary to demonstrate conformance with the SSMP when all actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan. (The information needed to demonstrate conformance with the SSMP may be recorded using a "checklist," or some other effective form of recordkeeping, to minimize the recordkeeping burden for conforming events);
- (vii) Each period during which a CMS is malfunctioning or inoperable (including out-of-control periods);
- (viii) All required measurements needed to demonstrate compliance with Subpart BB;
- (ix) All results of performance tests, in units of lb/ton and lb/hr;
- (x) All CMS calibration checks, and all adjustments and maintenance performed on the CMS;
- (xi) All measurements as may be necessary to determine the conditions of performance tests and performance evaluations;
- (xii) All documentation supporting initial notifications and notifications of compliance status under condition P63-BB7 of this permit.
- (xiii) All records of applicability determination, including supporting analysis;
- (xiv) All other records for CMSs required by Ch 5 Sec 3(l)(iii)(A), (B), (D-I), and (K).
- (xv) All other records required by Subpart BB and Chapter 5, Section 3.

(P63-BB7) NOTIFICATION REQUIREMENTS

[40 CFR 63 Subpart BB and WAQSR Ch 5, Sec 3(h), (i), (j), and (k)]

- (a) The permittee shall submit notifications required under this permit condition (P63-BB7), Subpart BB, and Chapter 5, Section 3 to the Administrator and U.S. EPA Region VIII in accordance with condition G4 of this permit.
- (b) The permittee shall notify the Administrator in writing of their intention to conduct any performance test required by condition P63-BB2 at least 60 calendar days before the performance test is scheduled to begin.
- (c) The permittee shall submit a Notification of Compliance Status upon completion of any relevant compliance demonstration activity specified in Subpart BB. This shall include the results in lb/ton and lb/hr of any performance test required under condition P63-BB2, which shall be reported within 60 days of completing the test. The Notification of Compliance Status shall include all information required by Ch 5, Sec 3(k)(viii).
- (d) The permittee shall submit all other notifications as required by 40 CFR Subpart BB and WAQSR Ch 5 Sec 3.

(P63-BB8) REPORTING REQUIREMENTS

[40 CFR 63 Subpart BB and WAQSR Ch 5, Sec 3(j); Sec 3(l)(i), (iv), and (v)]

- (a) The permittee shall submit reports required under this permit condition (P63-BB8), Subpart BB, and Chapter 5, Section 3 to the Administrator and U.S. EPA Region VIII in accordance with condition G4 of this permit.
- (b) The permittee shall submit Subpart BB emissions reports for any exceedance of an operating parameter limit, postmarked or delivered by January 30 and July 30 each year. If exceedances are reported, the permittee shall report quarterly until a request to reduce frequency is approved as described in Ch 5, Sec 3(l)(v). The summary report shall include:
 - (i) All exceedances of pressure drop or flow rate limitations specified in P63-BB1(b);
 - (ii) All other information listed in WAQSR Ch 5, Sec 3(l)(v)(C)(VI), except CMS performance reports are not required;
 - (iii) When no exceedances of an operating parameter have occurred, such information shall be included in the report; and
 - (iv) The name, title, and signature of the responsible official who is certifying the accuracy of the report.

- (c) If the total duration of operating parameter exceedances for a reporting period is 1 percent or greater of the total operating time for that reporting period, the permittee shall submit a summary report, as described in paragraph (b) above, and an excess emissions report. The reports shall be postmarked or delivered within 30 days of the end of the calendar quarter and shall include the following:
 - (i) Information required by WAQSR Ch 5, Sec 3(1)(iii)(B) and (D) through (I);
 - (ii) The name, title, and signature of the responsible official who is certifying the accuracy of the report.
- (d) Periodic startup, shutdown, and malfunction reports:
 - (i) If actions taken by the permittee during a startup, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are consistent with the procedures specified in the source's SSMP, the permittee shall state such information in a startup, shutdown, and malfunction report. Reports shall only be required if a startup, shutdown, or malfunction occurred during the reporting period. The startup, shutdown, and malfunction report shall consist of a letter, containing the name, title, and signature of the responsible official who is certifying its accuracy, which shall be submitted to the Administrator semiannually. The startup, shutdown, and malfunction report shall be delivered or postmarked by the 30th day following the end of each calendar half, and may be submitted simultaneously with the Subpart BB emissions reports.
 - (ii) Immediate startup, shutdown, and malfunction reports. Any time an action taken by a permittee during a startup, shutdown, or malfunction is not consistent with the procedures in the SSMP, the permittee shall make a report of the actions taken for the event within 24 hours, by telephone call or facsimile (FAX) transmission. The immediate report shall be followed by a letter, delivered or postmarked within 7 working days after the end of the event, that contains the name, title, and signature of the responsible official who is certifying its accuracy, explaining the circumstances of the event, the reasons for not following the SSMP, and whether any excess emissions and/or operating parameter exceedances are believed to have occurred.
 - (iv) For those malfunctions and or other events that affect a CMS and are not addressed by the SSMP, the permittee shall send a follow-up report within 2 weeks after commencing actions inconsistent with the plan that either certifies that corrections have been made or includes a corrective action plan and schedule. The permittee shall provide proof that repair parts have been ordered or any other records that would indicate that the delay in making repairs is beyond their control.
- (e) The permittee shall submit all other reports as required by §63.627 and Chapter 5, Section 3.

**WAQSR CHAPTER 5, SECTION 3 NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR
POLLUTANTS (NESHAPS) AND 40 CFR 63 SUBPART ZZZZ REQUIREMENTS FOR
STATIONARY RECIPROCATING INTERNAL COMBUSTION ENGINES**
(Modified July 21, 2014)

**SUBPART ZZZZ REQUIREMENTS [40 CFR 63 Subparts A and ZZZZ; WAQSR Ch 5, Sec 3; Ch 6, Sec 2
Waivers AP-2532, wv-11961, wv-12054, and AP-10572]**

The permittee shall meet all requirements of 40 CFR 63 Subparts A and ZZZZ and WAQSR Ch 5, Sec 3 as they apply to each affected source as indicated in §63.6590(a). An affected source is any existing, new, or reconstructed stationary RICE located at a major or area source of HAP emissions, excluding stationary RICE being tested at a stationary RICE test cell/stand. (As required by condition F11(c), if an engine is replaced or reconstructed, subpart applicability will need to be re-evaluated, and a statement regarding applicability submitted to the Division.) This facility is a major source of HAP emissions. Affected sources at this facility include the diesel fired engines (units 27, 28, 29 and 30), and the natural gas fired emergency engine (unit 34).

**WAQSR CHAPTER 5, SECTION 3 NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR
POLLUTANTS (NESHAPS) AND 40 CFR 63 SUBPART DDDDD REQUIREMENTS FOR
INDUSTRIAL, COMMERCIAL, AND INSTITUTIONAL BOILERS AND PROCESS HEATERS**
(Modified July 21, 2014)

SUBPART DDDDD REQUIREMENTS [40 CFR 63 Subparts A and DDDDD]

The permittee shall meet all requirements of 40 CFR 63 Subparts A and DDDDD and WAQSR Ch 5, Sec 3 as they apply to owners or operators of industrial, commercial, or institutional boilers or process heaters as defined in §63.7575 that are located at, or are part of, a major source of HAPs as defined in §63.2, except that for oil and natural gas production facilities, a major source of HAPs is as defined in §63.761 (40 CFR Part 63 Subpart HH). The types of boilers and process heaters listed in §63.7491 are not subject to Subpart DDDDD. This subpart applies to:

- (a) The collection of existing industrial, commercial, and institutional boilers and process heaters within a subcategory.
- (b) New or reconstructed industrial, commercial, or institutional boilers or process heaters, including the auxiliary and packaged boilers (units 8a and 19).

The subparts are available at <http://www.gpoaccess.gov/cfr/retrieve.html>, or from the Division upon request.

WAQSR CHAPTER 7, SECTION 3
COMPLIANCE ASSURANCE MONITORING (CAM) REQUIREMENTS
(Modified July 21, 2014)

WAQSR Ch 7, Sec 3 is available at <http://deq.state.wy.us/aqd/standards.asp>, or from the Division upon request.

- (CAM-1) COMPLIANCE ASSURANCE MONITORING REQUIREMENTS [WAQSR Ch 7, Sec 3(b) and (c)]
The permittee shall follow the CAM plan attached as Appendix C of this permit and meet all CAM requirements of WAQSR Ch 7, Sec 3 as they apply to acid mist emissions from the Lurgi and MEC sulfuric acid plants (units 9a and 9b), and particulate matter emissions from the ammonium phosphate plant (unit 10a) and the ammonium phosphate loadout (unit 12). Compliance with the source specific monitoring, recordkeeping, and reporting requirements of this permit meets the monitoring, recordkeeping, and reporting requirements of WAQSR Ch 7, Sec 3, except for additional requirements specified under conditions CAM-2 through CAM-4.
- (CAM-2) OPERATION OF APPROVED MONITORING [WAQSR Ch 7, Sec 3(g)]
- (a) At all times, the permittee shall maintain the monitoring under this section, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.
 - (b) Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities, the permittee shall conduct all monitoring in continuous operation (or at all required intervals) at all times that the pollutant specific emissions unit is operating.
 - (c) Upon detecting an excursion, the permittee shall restore operation of the pollutant-specific emission unit to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices. The response shall include minimizing the period of any start-up, shutdown or malfunction and taking any corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion.
 - (d) If the permittee identifies a failure to achieve compliance with an emission limit for which the monitoring did not provide an indication of an excursion while providing valid data, or the results of compliance or performance testing documents a need to modify the existing indicator ranges, the permittee shall promptly notify the Division and, if necessary, submit a proposed modification to this permit to address the necessary monitoring changes.
- (CAM-3) QUALITY IMPROVEMENT PLAN (QIP) REQUIREMENTS [WAQSR Ch 7, Sec 3(h)]
- (a) If the Division or the EPA Administrator determines, based on available information, that the permittee has used unacceptable procedures in response to an excursion or exceedance, the permittee may be required to develop and implement a Quality Improvement Plan (QIP).
 - (b) If required, the permittee shall maintain a written Quality Improvement Plan (QIP) and have it available for inspection.
 - (c) The plan shall include procedures for conducting one or more of the following:
 - (i) Improved preventative maintenance practices.
 - (ii) Process operation changes.
 - (iii) Appropriate improvements to control methods.
 - (iv) Other steps appropriate to correct control.
 - (v) More frequent or improved monitoring (in conjunction with (i)- (iv) above).
 - (d) If a QIP is required, the permittee shall develop and implement a QIP as expeditiously as practicable and shall notify the Division if the period for completing the QIP exceeds 180 days from the date on which the need to implement the QIP was determined.
 - (e) Following implementation of a QIP, upon any subsequent determination under paragraph (a) above, the Division may require the permittee to make reasonable changes to the QIP if the QIP failed to address the cause of control device problems, or failed to provide adequate procedures for correcting control device problems as expeditiously as practicable.
 - (f) Implementation of a QIP shall not excuse the permittee from compliance with any existing emission limit(s) or any existing monitoring, testing, reporting, or recordkeeping requirements that may be applicable to the facility.
- (CAM-4) SAVINGS PROVISIONS [WAQSR Ch 7, Sec 3(j)]
Nothing in the CAM regulations shall excuse the permittee from compliance with any existing emission limit or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may be applicable to the facility.

COMPLIANCE CERTIFICATION AND SCHEDULE

Compliance Certification [WAQSR Ch 6, Sec 3(h)(iii)(E)] (Modified July 21, 2014)

- (C1) (a) The permittee shall submit by January 31 each year a certification addressing compliance with the requirements of this permit. The certification shall be submitted as a stand-alone document separate from any monitoring reports required under this permit.
- (b) (i) For the sulfur dioxide emissions inventory, the permittee shall assess compliance with condition F2 by reviewing records kept in accordance with condition F23 and verifying reports were submitted in accordance with condition F32.
- (ii) For visible emissions from the Lurgi and MEC sulfuric acid plants (units 9a and 9b), the permittee shall assess compliance with conditions F3(a) and P60-H1 by conducting the CAM required by condition F18(a).
- (iii) For visible emissions from the phosphoric acid plants, and the ammonium phosphate plant (units 1a/1a', 1b, 2, and 10a), the permittee shall assess compliance with condition F3(c) by conducting the monitoring required by condition F15(a).
- (iv) For visible and particulate matter emissions from the ammonium phosphate loadoutbaghouse (unit 12), the permittee shall assess compliance with conditions F3(c) and F8(a) by conducting the CAM required by condition F20.
- (v) For visible and particulate matter emissions from the lime handling baghouse and soda ash handling baghouse (units 13a and 17), the permittee shall assess compliance with conditions F3(c) and F8(b) and (c) by conducting the monitoring required by condition F15(a).
- (vi) For visible emissions from the auxiliary and packaged boilers (units 8a and 19) and from the Cummins GM8.1L emergency engine (unit 34), the permittee shall assess compliance with condition F3(c) by verifying natural gas was the sole fuel source used as specified under condition F15(b).
- (vii) For visible emissions from the tailings booster engine (unit 28), the permittee shall assess compliance with conditions F3(b) by conducting monitoring required by condition F15(c).
- (viii) **Reserved**
- (ix) For P₂O₅ feed rate and fluoride emissions from the phosphoric acid plants (units 1a/1a', 1b, and 2), the permittee shall assess compliance with conditions F4(b)-(d) and P63-AA1 by conducting the testing and monitoring required by condition P63-AA3.
- (x) **Reserved**
- (xi) For particulate matter and SO₂ emissions from the auxiliary boiler (unit 8a), the permittee shall assess compliance with condition F5 by verifying natural gas was the sole fuel source used as specified under condition F17(a).
- (xii) For NO_x and CO emissions from the auxiliary boiler (unit 8a), the permittee shall assess compliance with condition F5 by conducting monitoring required by condition F17(b).
- (xiii) For SO₂ emissions from the sulfuric acid plants (units 9a and 9b), the permittee shall assess compliance with conditions F6, and P60-H1(a) by conducting the monitoring required by conditions F18(b) and P60-H1(b).
- (xiv) For sulfuric acid mist emissions from the sulfuric acid plants (units 9a and 9b), the permittee shall assess compliance with condition F6 by conducting the testing required by condition F12(a) and the CAM required by condition F18(a).
- (xv) For NO_x emissions from the sulfuric acid plants (units 9a and 9b), the permittee shall assess compliance with condition F6 by conducting the testing required by condition F12(b).
- (xvi) For sulfuric acid production from the MEC sulfuric acid plant, the permittee shall assess compliance with condition F6(b) by conducting the monitoring required by condition F18(d).
- (xvii) For particulate matter emissions from the ammonium phosphate plant (unit 10a), the permittee shall assess compliance with condition F7(a) by conducting the testing required by condition F13(b) and the CAM required by condition F19(a).
- (xviii) For SO₂ emissions from the sulfuric acid plants (units 9a and 9b), the permittee shall assess compliance with conditions F6, and P60-H1(a) by conducting the monitoring required by conditions F18(b) and P60-H1(b)..

- (xix) For NO_x and CO emissions from the ammonium phosphate plant, the permittee shall assess compliance with condition F7(a) by conducting testing required by condition F13(b).
 - (xx) For fluoride emissions from the ammonium phosphate plant, the permittee shall assess compliance with conditions F7(a) and P63-BB1 by conducting the testing required by condition P63-BB2, and the monitoring required by condition P63-BB3.
 - (xxi) For ammonia emissions from the ammonium phosphate plant, the permittee shall assess compliance with condition F7(a) and (b), by conducting the testing required by condition F13(b).
 - (xxii) For hourly heat input limitations for the packaged boiler (unit 19), the permittee shall assess compliance with condition F9(a) by conducting monitoring required by condition F21(a).
 - (xxiii) For NO_x emissions from the packaged boiler (unit 19), the permittee shall assess compliance with conditions F9(b) and P60-Db1 by conducting monitoring required by condition P60-Db2(c).
 - (xxiv) For CO emissions from the packaged boiler (unit 19), the permittee shall assess compliance with condition F9(c) by conducting monitoring required by condition F21(c).
 - (xxv) For the operating hour limit and maintenance for the Cummins KTTA50-G2 generator engine (unit 30), the permittee shall assess compliance with condition F10(a) by conducting monitoring required under condition F22(a), and reviewing records kept in accordance with condition F31.
 - (xxvi) For the emissions and operating hour limit for the Cummins GM8.1L generator engine (unit 34), the permittee shall assess compliance with the condition F10(b) by conducting monitoring and testing required by condition F22(a) and (b).
 - (xxvii) For fluosilicic acid recovery, the permittee shall assess compliance with condition F22(c) by reviewing records kept in accordance with condition F31(c).
 - (xxviii) For the accidental release prevention requirements, the permittee shall assess compliance with condition F39 by verifying certification was submitted as required by condition F39(b).
 - (xxix) For **each PSD project emission limit**, the permittee shall assess compliance with condition F40 by conducting the monitoring required by condition F41 and verifying notification and reporting was completed as required by condition F42 and F44.
 - (xxx) For the Cummins GM8.1L generator engine (unit 34) and any other engines subject to the requirements of 40 CFR 60 Subpart JJJJ, the permittee shall assess compliance with **Subpart JJJJ by conducting any applicable testing and monitoring required by §§60.4237, 60.4243, and 60.4244, and by reviewing the records required by §§60.4245 and 60.4246.**
 - (xxxii) For radon emissions from the phosphogypsum stacks and other phosphogypsum stack operating requirements, the permittee shall assess compliance with **40 CFR 61 Subpart R** by conducting the monitoring required under §§61.202, 61.204 and 61.205, and by reviewing the records required by §§61.203, 61.207, 61.208 and 61.209.
 - (xxxiii) For any engine subject to 40 CFR 60 Subpart IIII, the permittee shall assess compliance with **Subpart IIII by conducting any applicable testing and monitoring required by §§60.4209, 60.4211, 60.4212, and 60.4213, and by reviewing the records required by §§60.4211 and 60.4214.**
 - (xxxiiii) For the reciprocating internal combustion engines (units 27-30 and 34), the permittee shall assess compliance with **40 CFR 63 Subpart ZZZZ** by conducting any applicable testing and monitoring required by §§63.6610 through 63.6640 and by reviewing the records required by §§63.6655 and 63.6665.
 - (xxxv) For the boilers 8a and 19, the permittee shall assess compliance with **40 CFR 63 Subpart DDDDD** by conducting any applicable testing and monitoring required by §§63.7555 through 63.7541 and by reviewing any records required by §§63.7555 and 63.7560.
 - (xxxvi) For fluoride emissions, the permittee shall assess compliance with conditions S4 and S5 by conducting the monitoring required by conditions S6 and S7 and by reviewing the records required by conditions S8, S9, and S10.
- (c) The compliance certification shall include:
- (i) The permit condition or applicable requirement that is the basis of the certification;
 - (ii) The current compliance status;
 - (iii) Whether compliance was continuous or intermittent; and
 - (iv) The methods used for determining compliance.

- (d) For any permit conditions or applicable requirements for which the source is not in compliance, the permittee shall submit with the compliance certification a proposed compliance plan and schedule for Division approval.
- (e) The compliance certification shall be submitted to the Division in accordance with condition G4 of this permit and to the Assistant Regional Administrator, Office of Enforcement, Compliance, and Environmental Justice (8ENF-T), U.S. EPA - Region VIII, 1595 Wynkoop Street, Denver, CO 80202-1129.
- (f) Determinations of compliance or violations of this permit are not restricted to the monitoring requirements listed in paragraph (b) of this condition; other credible evidence may be used.

Compliance Schedule [WAQSR Ch 6, Sec 3(h)(iii)(C) and (D)]

- (C2) The permittee shall continue to comply with the applicable requirements with which the permittee has certified that it is already in compliance.
- (C3) The permittee shall comply in a timely manner with applicable requirements that become effective during the term of this permit.

GENERAL PERMIT CONDITIONS

Powers of the Administrator: [W.S. 35-11-110]

- (G1) (a) The Administrator may require the owner or operator of any point source to complete plans and specifications for any application for a permit required by the Wyoming Environmental Quality Act or regulations made pursuant thereto and require the submission of such reports regarding actual or potential violations of the Wyoming Environmental Quality Act or regulations thereunder.
- (b) The Administrator may require the owner or operator of any point source to establish and maintain records; make reports; install, use and maintain monitoring equipment or methods; sample emissions, or provide such other information as may be reasonably required and specified.

Permit Renewal and Expiration: [WAQSR Ch 6, Sec 3(c)(i)(C), (d)(ii), (d)(iv)(B), and (h)(i)(B)] [W.S. 35-11-206(f)]

- (G2) This permit is issued for a fixed term of five years. Permit expiration terminates the permittee's right to operate unless a timely and complete renewal application is submitted at least six months prior to the date of permit expiration. If the permittee submits a timely and complete application for renewal, the permittee's failure to have an operating permit is not a violation of WAQSR Chapter 6, Section 3 until the Division takes final action on the renewal application. This protection shall cease to apply after a completeness determination if the applicant fails to submit by the deadline specified in writing by the Division any additional information identified as being needed to process the application.

Duty to Supplement: [WAQSR Ch 6, Sec 3(c)(iii)]

- (G3) The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information. The permittee shall also provide additional information as necessary to address any requirements that become applicable to the facility after this permit is issued.

Submissions: [WAQSR Ch 6, Sec 3(c)(iv)] [W.S. 35-11-206(c)]

- (G4) Any document submitted shall be certified as being true, accurate, and complete by a responsible official.
- (a) Submissions to the Division.
- (i) Any submissions to the Division including reports, certifications, and emission inventories required under this permit shall be submitted as separate, stand-alone documents and shall be sent to:
Administrator, Air Quality Division
122 West 25th Street
Cheyenne, Wyoming 82002
- (ii) Unless otherwise noted elsewhere in this permit, a copy of each submission to the Administrator under paragraph (a)(i) of this condition shall be sent to the DEQ Air Quality Contact listed on page 3 of this permit.
- (b) Submissions to EPA.
- (i) Each certification required under condition C1 of this permit shall also be sent to:
Assistant Regional Administrator
Office of Enforcement, Compliance, and Environmental Justice (8ENF-T)
U.S. EPA - Region VIII
1595 Wynkoop Street
Denver, CO 80202-1129.
- (ii) All other required submissions to EPA shall be sent to:
Office of Partnerships and Regulatory Assistance
Air and Radiation Program (8P-AR)
U.S. EPA - Region VIII
1595 Wynkoop Street
Denver, CO 80202-1129

Changes for Which No Permit Revision Is Required [WAQSR Ch 6, Sec 3(d)(iii)]

- (G5) The permittee may change operations without a permit revision provided that:
- (a) The change is not a modification under any provision of title I of the Clean Air Act;
 - (b) The change has met the requirements of Chapter 6, Section 2 of the WAQSR and is not a modification under Chapter 5, Section 2 or Chapter 6, Section 4 of the WAQSR and the changes do not exceed the emissions allowed under the permit (whether expressed therein as a rate of emissions or in terms of total emissions); and
 - (c) The permittee provides EPA and the Division with written notification at least 14 days in advance of the proposed change. The permittee, EPA, and the Division shall attach such notice to their copy of the relevant permit. For each such change, the written notification required shall include a brief description of the change within the permitted facility, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change. The permit shield, if one exists for this permit, shall not apply to any such change made.

Transfer of Ownership or Operation: [WAQSR Ch 6, Sec 3(d)(v)(A)(IV)]

- (G6) A change in ownership or operational control of this facility is treated as an administrative permit amendment if no other change in this permit is necessary and provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to the Division.

Reopening for Cause: [WAQSR Ch 6, Sec 3(d)(vii)] [W.S. 35-11-206(f)(ii) and (iv)]

- (G7) The Division will reopen and revise this permit as necessary to remedy deficiencies in the following circumstances:
- (a) Additional applicable requirements under the Clean Air Act or the WAQSR that become applicable to this source if the remaining permit term is three or more years. Such reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended.
 - (b) Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit.
 - (c) The Division or EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
 - (d) The Division or EPA determines that the permit must be revised or revoked to assure compliance with applicable requirements.

Annual Fee Payment: [WAQSR Ch 6, Sec 3(f)(i), (ii), and (vi)] [W.S. 35-11-211]

- (G8) The permittee shall, as a condition of continued operations, submit an annual fee to the Division as established in Chapter 6, Section 3 (f) of the WAQSR. The Division shall give written notice of the amount of fee to be assessed and the basis for such fee assessment annually. The assessed fee is due on receipt of the notice unless the fee assessment is appealed pursuant to W.S. 35-11-211(d). If any part of the fee assessment is not appealed it shall be paid to the Division on receipt of the written notice. Any remaining fee which may be due after completion of the appeal is immediately due and payable upon issuance of the Council's decision. Failure to pay fees owed the Division is a violation of Chapter 6, Section 3 (f) and W.S. 35-11-203 and may be cause for the revocation of this permit.

Annual Emissions Inventories: [WAQSR Ch 6, Sec 3(f)(v)(G)]

- (G9) The permittee shall submit an annual emission inventory for this facility to the Division for fee assessment and compliance determinations within 60 days following the end of the calendar year. The emissions inventory shall be in a format specified by the Division.

Severability Clause: [WAQSR Ch 6, Sec 3(h)(i)(E)]

- (G10) The provisions of this permit are severable, and if any provision of this permit, or the application of 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.

Compliance: [WAQSR Ch 6, Sec 3(h)(i)(F)(I) and (II)] [W.S. 35-11-203(b)]

- (G11) The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Clean Air Act, Article 2 of the Wyoming Environmental Quality Act, and the WAQSR and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

Permit Actions: [WAQSR Ch 6, Sec 3(h)(i)(F)(III)] [W.S. 35-11-206(f)]

- (G12) This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Property Rights: [WAQSR Ch 6, Sec 3(h)(i)(F)(IV)]

- (G13) This permit does not convey any property rights of any sort, or any exclusive privilege.

Duty to Provide Information: [WAQSR Ch 6, Sec 3(h)(i)(F)(V)]

- (G14) The permittee shall furnish to the Division, within a reasonable time, any information that the Division may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Division copies of records required to be kept by the permit, including information claimed and shown to be confidential under W.S. 35-11-1101 (a) of the Wyoming Environmental Quality Act. Upon request by the Division, the permittee shall also furnish confidential information directly to EPA along with a claim of confidentiality.

Emissions Trading: [WAQSR Ch 6, Sec 3(h)(i)(H)]

- (G15) No permit revision is required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.

Inspection and Entry: [WAQSR Ch 6, Sec 3(h)(iii)(B)] [W.S. 35-11-206(c)]

- (G16) Authorized representatives of the Division, upon presentation of credentials and other documents as may be required by law, shall be given permission to:
- (a) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
 - (b) have access to and copy at reasonable times any records that must be kept under the conditions of this permit;
 - (c) inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
 - (d) sample or monitor any substances or parameters at any location, during operating hours, for the purpose of assuring compliance with this permit or applicable requirements.

Excess Emissions Due to an Emergency: [WAQSR Ch 6, Sec 3(I)]

- (G17) The permittee may seek to establish that noncompliance with a technology-based emission limitation under this permit was due to an emergency, as defined in Ch 6, Sec 3(I)(i) of the WAQSR. To do so, the permittee shall demonstrate the affirmative defense of emergency through properly signed, contemporaneous operating logs, or other relevant evidence that:
- (a) an emergency occurred and that the permittee can identify the cause(s) of the emergency;
 - (b) the permitted facility was, at the time, being properly operated;
 - (c) during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards, or other requirements in this permit;

- (d) The permittee submitted notice of the emergency to the Division within one working day of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

Diluting and Concealing Emissions: [WAQSR Ch 1, Sec 4]

- (G18) No person shall cause or permit the installation or use of any device, contrivance, or operational schedule which, without resulting in reduction of the total amount of air contaminant released to the atmosphere, shall dilute or conceal an emission from a source. This condition shall not apply to the control of odors.

Unavoidable Equipment Malfunction: [WAQSR Ch 1, Sec 5]

- (G19) (a) Any source believing that any emissions in excess of established regulation limits or standards resulted from an unavoidable equipment malfunction, shall notify the Division within 24 hours of the incident via telephone, electronic mail, fax, or other similar method. A detailed description of the circumstances of the incident as described in paragraph 5(a)(i)(A) Chapter 1, including a corrective program directed at preventing future such incidents, must be submitted within 14 days of the onset of the incident. The Administrator may extend this 14-day time period for cause.
- (b) The burden of proof is on the owner or operator of the source to provide sufficient information to demonstrate that an unavoidable equipment malfunction occurred.

Fugitive Dust: [WAQSR Ch 3, Sec 2(f)]

- (G20) The permittee shall minimize fugitive dust in compliance with standards in Ch 3, Sec 2(f) of WAQSR for construction/demolition activities, handling and transportation of materials, and agricultural practices.

Carbon Monoxide: [WAQSR Ch 3, Sec 5]

- (G21) The emission of carbon monoxide in stack gases from any stationary source shall be limited as may be necessary to prevent ambient standards from being exceeded.

Asbestos: [WAQSR Ch 3, Sec 8]

- (G22) The permittee shall comply with emission standards for asbestos during abatement, demolition, renovation, manufacturing, spraying and fabricating activities.
- (a) No owner or operator shall build, erect, install, or use any article, machine, equipment, process, or method, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous dilutants to achieve compliance with a visible emissions standard, and the piecemeal carrying out of an operation to avoid coverage by a standard that applies only to operations larger than a specified size.
- (b) All owners and operators conducting an asbestos abatement project, including an abatement project on a residential building, shall be responsible for complying with Federal requirements and State standards for packaging, transportation, and delivery to an approved waste disposal facility as provided in paragraph (m) of Ch 3, Sec 8.
- (c) The permittee shall follow State and Federal standards for any demolition and renovation activities conducted at this facility, including:
- (i) A thorough inspection of the affected facility or part of the facility where the demolition or renovation activity will occur shall be conducted to determine the presence of asbestos, including Category I and Category II non-friable asbestos containing material. The results of the inspection will determine which notification and asbestos abatement procedures are applicable to the activity.
- (ii) The owner or operator shall follow the appropriate notification requirements of Ch 3, Sec 8(i)(ii).
- (iii) The owner or operator shall follow the appropriate procedures for asbestos emissions control, as specified in Chapter 3, Section 8(i)(iii).
- (d) No owner or operator of a facility may install or reinstall on a facility component any insulating materials that contain commercial asbestos if the materials are either molded and friable or wet-applied and friable after drying. The provisions of this paragraph do not apply to spray-applied insulating materials regulated under paragraph (j) of Ch 3, Sec 8.
- (e) The permittee shall comply with all other requirements of WAQSR Ch 3, Sec 8.

Open Burning Restrictions: [WAQSR Ch 10, Sec 2]

- (G23) The permittee conducting an open burn shall comply with all rules and regulations of the Wyoming Department of Environmental Quality, Division of Air Quality, and with the Wyoming Environmental Quality Act.
- (a) No person shall burn prohibited materials using an open burning method, except as may be authorized by permit. ***“Prohibited materials”*** means substances including, but not limited to; natural or synthetic rubber products, including tires; waste petroleum products, such as oil or used oil filters; insulated wire; plastic products, including polyvinyl chloride (“PVC”) pipe, tubing and connectors; tar, asphalt, asphalt shingles, or tar paper; railroad ties; wood, wood waste, or lumber that is painted or chemically treated; explosives or ammunition; batteries; hazardous waste products; asbestos or asbestos containing materials; or materials which cause dense smoke discharges, excluding refuse and flaring associated with oil and gas well testing, completions and well workovers.
- (b) No person or organization shall conduct or cause or permit open burning for the disposal of trade wastes, for a salvage operation, for the destruction of fire hazards if so designated by a jurisdictional fire authority, or for firefighting training, except when it can be shown by a person or organization that such open burning is absolutely necessary and in the public interest. Any person or organization intending to engage in such open burning shall file a request to do so with the Division.

Sulfur Dioxide Emission Trading and Inventory Program [WAQSR Ch 14]

- (G24) Any BART (Best Available Retrofit Technology) eligible facility, or facility which has actual emissions of SO₂ greater than 100 tpy in calendar year 2000 or any subsequent year, shall comply with the applicable requirements of WAQSR Ch 14, Sections 1 through 3, with the exceptions described in sections 2(c) and 3(a).

Stratospheric Ozone Protection Requirements: [40 CFR Part 82]

- (G25) The permittee shall comply with all applicable Stratospheric Ozone Protection Requirements, including but not limited to:
- (a) *Standards for Appliances* [40 CFR Part 82, Subpart F]
The permittee shall comply with the standards for recycling and emission reduction pursuant to 40 CFR Part 82, Subpart F - Recycling and Emissions Reduction, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
- (i) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - (ii) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - (iii) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - (iv) Persons disposing of small appliances, MVACs and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. (“MVAC-like appliance” as defined at §82.152).
 - (v) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.166.
 - (vi) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
 - (vii) The permittee shall comply with all other requirements of Subpart F.
- (b) *Standards for Motor Vehicle Air Conditioners* [40 CFR Part 82, Subpart B]
If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term “motor vehicle” as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term “MVAC” as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or the system used on passenger buses using HCFC-22 refrigerant.

STATE ONLY PERMIT CONDITIONS

(Modified July 21, 2014)

The conditions listed in this section are State only requirements and are not federally enforceable.

Ambient Standards

(S1) The permittee shall operate the emission units described in this permit such that the following ambient standards are not exceeded, in accordance with 40 CFR 50:

POBULETANT	STANDARD	CONDITION	WAQSR CH. 2, SEC.
PM ₁₀ particulate matter	50 micrograms per cubic meter	annual arithmetic mean	2 (a)
	150 micrograms per cubic meter	24-hr average concentration with not more than one exceedance per year	
PM _{2.5} particulate matter	15 micrograms per cubic meter	annual arithmetic mean	2 (b)
	35 micrograms per cubic meter	98 th percentile 24-hour average concentration	
Nitrogen dioxide	53 parts per billion	annual average concentration	3
	100 parts per billion	three-year average of the annual 98th percentile of the daily maximum 1-hr average concentration	
	0.053 parts per million	annual arithmetic mean	
Sulfur dioxide	75 parts per billion	three-year average of the annual (99th percentile) of the daily max 1-hr average	4
	0.5 parts per million	3-hr blocks not to be exceeded more than once per calendar year	
Carbon monoxide	10 milligrams per cubic meter	max 8-hr concentration with not more than one exceedance per year	5
	40 milligrams per cubic meter	max 1-hr concentration with not more than one exceedance per year	
Ozone	0.075 parts per million	three-year average of the annual fourth-highest daily maximum 8-hr average concentration	6
Hydrogen sulfide	70 micrograms per cubic meter	½ hour average not to be exceeded more than two times per year	7
	40 micrograms per cubic meter	½ hour average not to be exceeded more than two times in any five consecutive days	
Suspended sulfate	0.25 milligrams SO ₃ per 100 square centimeters per day	maximum annual average	8
	0.50 milligrams SO ₃ per 100 square centimeters per day	maximum 30-day value	
Lead and its compounds	0.15 micrograms per cubic meter	maximum arithmetic 3-month mean concentration for a 3-year period	10

Hydrogen Sulfide: [WAQSR Ch 3, Sec 7]

(S2) Any exit process gas stream containing hydrogen sulfide which is discharged to the atmosphere from any source shall be vented, incinerated, flared or otherwise disposed of in such a manner that ambient sulfur dioxide and hydrogen sulfide standards are not exceeded.

Odors: [WAQSR Ch 2, Sec 11]

- (S3) (a) The ambient air standard for odors from any source shall be limited to an odor emission at the property line which is undetectable at seven dilutions with odor free air as determined by a scentometer as manufactured by the Barnebey-Cheney Company or any other instrument, device, or technique designated by the Division as producing equivalent results. The occurrence of odors shall be measured so that at least two measurements can be made within a period of one hour, these determinations being separated by at least 15 minutes.
- (b) Odor producing materials shall be stored, transported, and handled in a manner that odors produced from such materials are confined and that accumulation of such materials resulting from spillage or other escape is prevented.

Fluorides: [WAQSR Ch 2, Sec 9]

- (S4) (a) The permittee shall operate the emission units described in this permit such that the following ambient standards for fluorides, measured as hydrogen fluorides, are not exceeded:

(i) Statewide Standard

Averaging Time	Maximum Allowable Concentration ($\mu\text{g}/\text{m}^3$)
12 hours	3.0
24 hours	1.8
7 days	0.5
30 days	0.4

(ii) Regional Standard

Averaging Time	Maximum Allowable Concentration ($\mu\text{g}/\text{m}^3$)
12 hours	10.0
24 hours	4.0
7 days	1.8
30 days	1.2

The Regional Standard applies to the area encompassing the following lands in Sweetwater County, Wyoming:

- T19N R104W, E ½ Section 31 & Sections 32, 33, 34, 35, 36;
 T19N R103W, Section 31;
 T18N R105W, S ½ Section 1 & Sections 12, 13, 24, 25, 35, 36;
 T18N R104W, All Sections 1 through 36;
 T18N R103W, Sections 6, 7, 18, 19, 30, 31, 32, 33;
 T17N R105W, Sections 1, 2, 11, 12, 13, 14, 23, 24, 25, 26;
 T17N R104W, Sections 1 through 30; and
 T17N R103W, Sections 4, 5, 6, 7, 8, 9, 16, 17, 18, 19, 20, 21, 28, 29, 30

- (b) The standards for fluoride in forage for animal consumption measured as fluorine, dry weight basis, are:

Averaging Time	Maximum Allowable Concentration (ppm)
One year	30
60 days	60
30 days	80

- (S5) FLUORIDE CONTROL TECHNIQUES [WAQSR Ch 6, Sec 2 Permit AP-7283]
The permittee shall continue to implement the techniques for controlling fluoride emissions from the gypsum pond (unit 14) as outlined in Appendix M of this permit. Any revisions to the plan must be approved by the Division prior to implementation.

Monitoring Requirements

- (S6) AMBIENT & METEOROLOGICAL MONITORING [WAQSR Ch 6, Sec 2 Permits CT-550A and MD-384A]
(a) The permittee shall continue to operate an ambient fluoride monitoring program acceptable to the Division. Monitoring of ambient hydrogen fluoride (HF) shall be used as a direct indicator of compliance with the standards in condition S4(a) of this permit.
(b) The permittee shall continue to maintain a meteorological station acceptable to the Division to gather meteorological data including wind speed, wind direction, and atmospheric stability.
(c) The permittee shall maintain a quality assurance plan for the monitoring network, as required by 40 CFR Part 58. The plan shall be submitted and approved by the Division. The permittee shall comply with all commitments made in the plan.
- (S7) FLUORIDE IN FORAGE MONITORING [WAQSR Ch 6, Sec 2 Permit CT-550A3]
The permittee shall monitor fluoride in forage to determine compliance with the standards in condition S4(b) of this permit. Monitoring shall be conducted as specified in condition #3 of permit CT-550A3 provided in Appendix N of this permit.

Recordkeeping Requirements

- (S8) FLUORIDE CONTROL RECORDS [WAQSR Ch 6, Sec 3 (h)(i)(C)(II)]
The permittee shall maintain records of what techniques are used and when the techniques are used for controlling fluoride emissions from the gypsum pond (unit 14) as described in condition S5 of this permit. The permittee shall retain on-site at the facility all fluoride control records for a period of at least five years from the date such records are generated.
- (S9) AMBIENT & METEOROLOGICAL MONITORING RECORDS [WAQSR Ch 6, Sec 3 (h)(i)(C)(II)]
The permittee shall maintain records of the data generated by the ambient monitoring program and meteorological station. The permittee shall retain on-site at the facility all ambient and meteorological monitoring records for a period of at least five years from the date such records are generated.
- (S10) FLUORIDE IN FORAGE MONITORING RECORDS [WAQSR Ch 6, Sec 3 (h)(i)(C)(II)]
The permittee shall maintain records of the data generated by the fluoride in forage monitoring program described in condition S7 of this permit. The permittee shall retain on-site at the facility all fluoride in forage monitoring records for a period of at least five years from the date such records are generated.

Reporting Requirements

- (S11) FLUORIDE CONTROL PROGRESS REPORTS [WAQSR Ch 6, Sec 3 (h)(i)(C)(III)]
The permittee shall submit progress reports on the control of fluoride emissions from the gypsum pond (unit 14) as described in the Fluoride Control Techniques Document in Appendix M of this permit. The reports shall be submitted to the Division in accordance with condition G4 of this permit.
- (S12) AMBIENT MONITORING REPORTS [WAQSR Ch 6, Sec 2 Permit CT-550A]
The ambient monitoring data retained in accordance with condition S9 shall be submitted to the Division in an acceptable format within 60 days of the end of each calendar quarter. The reports shall be submitted to the Division in accordance with condition G4 of this permit.
- (S13) FLUORIDE IN FORAGE MONITORING REPORTS [WAQSR Ch 6, Sec 2 Permit CT-550A]
The fluoride in forage monitoring data retained in accordance with condition S10 of this permit shall be submitted to the Division in an acceptable format within 60 days of the end of each calendar quarter. The reports shall be submitted to the Division in accordance with condition G4 of this permit.

SUMMARY OF SOURCE EMISSION LIMITS AND REQUIREMENTS
(Modified July 21, 2014)

Source ID#: 1a/ 1a' and 1b, and 2 Source Description: Phosphoric Acid Plants, and Superphosphoric Acid Plant

Pollutant	Emissions Limit/Work Practice Standard	Corresponding Regulation(s)	Testing Requirements	Monitoring Requirements	Recordkeeping Requirements	Reporting Requirements
Particulate	20 percent opacity [F3]	WAQSR Ch 3, Sec 2	Testing if required [F14]	Weekly visual observations and corrective actions [F15]	Visible emissions monitoring records [F24]	Visible emissions monitoring reports [F34] Report excess emissions and permit deviations [F37]
Fluoride	For units 1a/1a' and 1b: 0.01350 lb/ton of P ₂ O ₅ feed, 0.65 lb/hr [F4 and P63-AA1] For unit 2: 0.010 lb/ton of P ₂ O ₅ feed, 0.18 lb/hr [F4 and P63-AA1] Pressure drop and flow rate requirements for scrubber [P63-AA1]	WAQSR Ch 6, Sec 2 Permits CT-550A, MD-384A, CT-1043 WAQSR Ch 5, Sec 3; 40 CFR 63 Subpart AA	Additional testing if required [F14] Test annually for fluoride [F13]	Monitor P ₂ O ₅ production [F16] Monitor process feed rate, scrubber liquor flow rate, and scrubber pressure drop [F16 & P63-AA3]	Record any testing [F25] Record P ₂ O ₅ production [F26] Record test results and monitoring [P63-AA6]	Notification of testing and compliance status [P63-AA7] Excess emissions, operating parameter exceedances, periodic startup, shutdown, and malfunction reports [F37 and P63-AA8]
Various	Project emission levels for 1a/1a' and 1b [F40]	WAQSR Ch 6, Sec 2 Permit MD-12795	Testing if required [F14]	Project monitoring [F41]	Project recordkeeping [F43 and F45]	Report excess emissions and permit deviations [F37] Project notifications [F42] Project reports [F44]

These tables are intended only to highlight and summarize applicable requirements for each source. The corresponding permit conditions, listed in brackets, contain detailed descriptions of the compliance requirements. Compliance with the summary conditions in these tables may not be sufficient to meet permit requirements. These tables may not reflect all emission sources at this facility.

Source ID#: 8a Source Description: Auxiliary Boiler

Pollutant	Emissions Limit/Work Practice Standard	Corresponding Regulation(s)	Testing Requirements	Monitoring Requirements	Recordkeeping Requirements	Reporting Requirements
Particulate	20 percent opacity [F3] 0.55 lb/hr [F5]	WAQSR Ch 3, Sec 2 and Ch 6, Sec 2 Permit CT-1043	Testing if required [F14]	Natural gas firing [F15 and F17]	Record any test results [F25]	Report fuel type [F34] Report excess emissions and permit deviations [F37]
SO ₂	0.07 lb/hr [F5]	WAQSR Ch 6, Sec 2 Permit CT-1043	Testing if required [F14]	Natural gas firing [F17]	Record any test results [F25]	Report fuel type [F34] Report excess emissions and permit deviations [F37]
NO _x	20.02 lb/hr [F5] 50 TPY emission level [F40]	WAQSR Ch 6, Sec 2 Permits CT-1043, AP-12908	Testing if required [F14]	Test every 5 years or 8,000 hours [F17] Project monitoring [F41]	Testing and hours of operation records [F25] Project recordkeeping [F43 and F45]	Report test results [F33] Report excess emissions and permit deviations [F37] Project Reports [F44]
CO	1.87 lb/hr [F5]	WAQSR Ch 6, Sec 2 Permit CT-1043	Testing if required [F14]	Test every 5 years or 8,000 hours [F17]	Testing and hours of operation records [F25]	Report test results [F33] Report excess emissions and permit deviations [F37]
HAPs	WAQSR Ch 5, Sec 3 and 40 CFR 63 Subpart DDDDD					

These tables are intended only to highlight and summarize applicable requirements for each source. The corresponding permit conditions, listed in brackets, contain detailed descriptions of the compliance requirements. Compliance with the summary conditions in these tables may not be sufficient to meet permit requirements. These tables may not reflect all emission sources at this facility.

Source ID#: 9a Source Description: Lurgi Sulfuric Acid Plant

Pollutant	Emissions Limit/Work Practice Standard	Corresponding Regulation(s)	Testing Requirements	Monitoring Requirements	Recordkeeping Requirements	Reporting Requirements
SO ₂	316.67 lb/hr, 4 lb/ton of acid produced [F6 and P60-H1]	WAQSR Ch 6, Sec 2 Permits CT-550A and CT-1043, Ch 5, Sec 2; 40 CFR 60 Subpart H	Testing if required [F14]	Continuous emissions monitoring [F18 and P60-H1]	Monitoring records [F27 and P60-H2]	Report excess emissions quarterly [P60-H3] Report excess emissions and permit deviations [F37]
Opacity/ sulfuric acid mist	10 percent opacity [F3] 11.88 lb/hr, 0.15 lb/ton of acid produced [F6]	WAQSR Ch 6, Sec 2 Permit CT-1043; Ch 5, Sec 2; 40 CFR 60 Subpart H	Sulfuric acid testing every five years [F12] Additional testing if required [F14]	CAM - daily visual observations and corrective actions [F18]	Visible emissions monitoring records [F24] Test records [F25] CAM records [F27]	Test results [F33] CAM reports [F35] Report excess emissions and permit deviations [F37]
NO _x	53.53 lb/hr [F6]	WAQSR Ch 6, Sec 2 Permit CT-1043	Annual testing [F12] Additional testing if required [F14]	Testing per F12 [F18]	Test records [F25]	Test results [F33] Report excess emissions and permit deviations [F37]
Various	Project emission levels [F40]	WAQSR Ch 6, Sec 2 Permit MD-12795	Testing if required [F14]	Project monitoring [F41]	Project recordkeeping [F43 and F45]	Report excess emissions and permit deviations [F37] Project notifications [F42] Project reports [F44]

These tables are intended only to highlight and summarize applicable requirements for each source. The corresponding permit conditions, listed in brackets, contain detailed descriptions of the compliance requirements. Compliance with the summary conditions in these tables may not be sufficient to meet permit requirements. These tables may not reflect all emission sources at this facility.

Source ID#: 9b Source Description: MEC Acid Plant

Pollutant	Emissions Limit/Work Practice Standard	Corresponding Regulation(s)	Testing Requirements	Monitoring Requirements	Recordkeeping Requirements	Reporting Requirements
SO ₂	253.3 lb/hr and 1109.6 TPY, 4 lb/ton of acid produced [F6]	WAQSR Ch 6, Sec 2 Permit MD-1130; Ch 5, Sec 2; 40 CFR 60 Subpart H	Testing if required [F14]	Continuous emissions monitoring [P60-H1]	Monitoring records [P60-H2]	Report excess emissions quarterly [P60-H3] Report excess emissions and permit deviations [F37]
Opacity/ sulfuric acid mist	10 percent opacity [F3] 6.3 lb/hr, 27.7 TPY, 0.10 lb/ton acid produced [F6] 1520 TPD 100% sulfuric acid production [F6]	WAQSR Ch 6, Sec 2 Permit MD-1130; Ch 5, Sec 2; 40 CFR 60 Subpart H	Test every five years [F12] Additional testing if required [F14]	CAM- daily visual observations and corrective actions [F18] Monitor sulfuric acid production [F18]	Visible emissions monitoring records [F24] Test records [F25] CAM and production records [F27]	Test results [F33] Production monitoring reports [F34] CAM reports [F35] Report excess emissions and permit deviations [F37]
NO _x	16.3 lb/hr, 71.3 TPY, and 0.26 lb/ton of acid produced [F6]	WAQSR Ch 6, Sec 2 Permit MD-1130	Annual testing [F12] Additional testing if required [F14]	Testing per F12 [F18]	Test records [F25]	Test results [F33] Report excess emissions and permit deviations [F37]
Various	Project emission levels [F40]	WAQSR Ch 6, Sec 2 Permit MD-12795	Testing if required [F14]	Project monitoring [F41]	Project recordkeeping [F43 and F45]	Report excess emissions and permit deviations [F37] Project notifications [F42] Project reports [F44]

These tables are intended only to highlight and summarize applicable requirements for each source. The corresponding permit conditions, listed in brackets, contain detailed descriptions of the compliance requirements. Compliance with the summary conditions in these tables may not be sufficient to meet permit requirements. These tables may not reflect all emission sources at this facility.

Source ID#: 10a Source Description: Ammonium Phosphate (MAP) Plant

Pollutant	Emissions Limit/Work Practice Standard	Corresponding Regulation(s)	Testing Requirements	Monitoring Requirements	Recordkeeping Requirements	Reporting Requirements
Particulate	20 percent opacity [F3] 20.00 lb/hr [F7]	WAQSR Ch 3, Sec 2 and Ch 6, Sec 2 Permit CT-1043	Test annually [F13] Additional testing if required [F14]	Weekly visual observations and corrective actions [F15] CAM - monitor scrubber pressure drop and liquor flow daily [F19]	Visible emissions monitoring records [F24] Test records [F25] CAM records [F28]	Test results [F33] Visible emissions monitoring reports [F34] CAM reporting [F35] Report excess emissions and permit deviations [F37]
SO ₂	19.88 lb/hr, 0.5% fuel oil sulfur content for dryer [F7]	WAQSR Ch 6, Sec 2 Permits CT-550A and CT-1043	Testing if required [F14]	Monitor fuel oil sulfur content [F19]	Fuel sulfur monitoring records [F28]	Fuel sulfur monitoring reports [F34] Report excess emissions and permit deviations [F37]
NO _x	5.84 lb/hr [F7]	WAQSR Ch 6, Sec 2 Permit CT-1043	Test every five years, or 8,000 hours [F13] Additional testing if required [F14]	Testing per F13 [F19]	Testing and hours of operation records [F25]	Test results [F33] Report excess emissions and permit deviations [F37]
Fluoride	0.060 lb/ton of P ₂ O ₅ feed; 2.30 lb/hr [F7, P63-BB1], Pressure drop and flow rate for scrubber []	WAQSR Ch 6, Sec 2 Permit CT-1043; WAQSR Ch 5, Sec 3; 40 CFR 63 Subpart BB	Test annually [F13 and P63-BB2] Additional testing if required [F14]	Monitor process feed rate, scrubber pressure drop and liquor flow [F19 and P63-BB3]	Testing and monitoring records [F25 and P63-BB6]	Summary; excess emissions; SSM reports, and permit deviations [F37 and P63-BB8] Notification of testing and compliance status [P63-BB7]
CO	1.40 lb/hr [F7]	WAQSR Ch 6, Sec 2 Permit CT-1043	Test every five years, or 8,000 hours [F13] Additional testing if required [F14]	Testing per F13 [F19]	Testing and hours of operation records [F25]	Test results [F33] Report excess emissions and permit deviations [F37]
Ammonia	100 lb/hr, 438 TPY; 98% minimum recovery efficiency [F7]	WAQSR Ch 6, Sec 2 Permit CT-550A2	Test annually [F13] Additional testing if required [F14]	Testing per F13 [F19]	Test records [F25]	Test results [F33] Report excess emissions and permit deviations [F37]
Various	Project emission levels [F40]	WAQSR Ch 6, Sec 2 Permit MD-12795	Testing if required [F14]	Project monitoring [F41]	Project recordkeeping [F43 and F45]	Report excess emissions and permit deviations [F37] Project notifications [F42] Project reports [F44]

These tables are intended only to highlight and summarize applicable requirements for each source. The corresponding permit conditions, listed in brackets, contain detailed descriptions of the compliance requirements. Compliance with the summary conditions in these tables may not be sufficient to meet permit requirements. These tables may not reflect all emission sources at this facility.

Source ID#: 12 Source Description: Ammonium Phosphate Loadout Baghouse

Pollutant	Emissions Limit/Work Practice Standard	Corresponding Regulation(s)	Testing Requirements	Monitoring Requirements	Recordkeeping Requirements	Reporting Requirements
Particulate	20 percent opacity [F3] 0.50 lb/hr [F8]	WAQSR Ch 3, Sec 2 and Ch 6, Sec 2 Permit CT-1043	Testing if required [F14]	CAM - daily visual observations and corrective actions [F20]	Visible emissions monitoring records [F24] CAM records [F29]	CAM reports [F35] Report excess emissions and permit deviations [F37]
Various	Project emission levels [F40]	WAQSR Ch 6, Sec 2 Permit MD-12795	Testing if required [F14]	Project monitoring [F41]	Project recordkeeping [F43 and F45]	Report excess emissions and permit deviations [F37] Project notifications [F42] Project reports [F44]

Source ID#: 13a and 17 Source Description: Lime and Soda Ash Handling Baghouses

Pollutant	Emissions Limit/Work Practice Standard	Corresponding Regulation(s)	Testing Requirements	Monitoring Requirements	Recordkeeping Requirements	Reporting Requirements
Particulate	20 percent opacity [F3] Unit 13a: 0.11 lb/hr Unit 17: 0.10 lb/hr [F8]	WAQSR Ch 3, Sec 2 and Ch 6, Sec 2 Permit CT-1043	Testing if required [F14]	Weekly visual observations and corrective actions [F15]	Visible emissions monitoring records [F24]	Visible emissions monitoring reports [F34] Report excess emissions and permit deviations [F37]

Source ID#: 14 Source Description: Gypsum Tailings Pond

Pollutant	Emissions Limit/Work Practice Standard	Corresponding Regulation(s)	Testing Requirements	Monitoring Requirements	Recordkeeping Requirements	Reporting Requirements
Fluoride	Continue to implement the Fluoride Control Techniques attached as Appendix M [S5]	WAQSR Ch 6, Sec 2 Permit AP-7283	Testing if required [F14]	Ambient HF monitoring results used to determine additional actions under the decision tree contained in the Fluoride Control Techniques document (Appendix M) [S5 and 6]**	Record techniques used to control fluoride emissions from the gypsum pond [S8]	Report excess emissions and permit deviations [F37] Progress reports on gypsum pond fluoride emissions control [S11]
HAPs	40 CFR 61 Subpart R					
Various	Project emission levels for [F40]	WAQSR Ch 6, Sec 2 Permit MD-12795	Testing if required [F14]	Project monitoring [F41]	Project recordkeeping [F43 and F45]	Report excess emissions and permit deviations [F37] Project notifications [F42] Project reports [F44]

** Additional requirements which are not specific to a single source at the facility include monitoring, recordkeeping, and reporting requirements for ambient HF monitoring and fluoride in forage monitoring contained in conditions S6, S7, S9, S10, S12, and S13.

These tables are intended only to highlight and summarize applicable requirements for each source. The corresponding permit conditions, listed in brackets, contain detailed descriptions of the compliance requirements. Compliance with the summary conditions in these tables may not be sufficient to meet permit requirements. These tables may not reflect all emission sources at this facility.

Source ID#: 19 Source Description: **Packaged Boiler**

Pollutant	Emissions Limit/Work Practice Standard	Corresponding Regulation(s)	Testing Requirements	Monitoring Requirements	Recordkeeping Requirements	Reporting Requirements
Particulate	20 percent opacity [F3]	WAQSR Ch 3, Sec 2	Testing if required [F14]	Natural gas firing [F15]	Record any test results [F25]	Report fuel type [F34] Report excess emissions and permit deviations [F37]
NO _x	Hourly heat input not to exceed 122.5 MMBtu/hr for more than 1056 hrs/yr [F9] 0.14 lb/MMBtu, not to exceed 49.00 lb/hr at the maximum firing rate of 350 MMBtu/hr for 1056 hrs/yr AND 0.14 lb/MMBtu, not to exceed 17.20 lb/hr at firing rates at or below 122.5 MMBtu/hr [F9 and P60-Db1]	WAQSR Ch 6, Sec 2 Permit CT-1043	Testing if required [F14]	Monitor gas flow [F21] Continuous emissions monitoring [F21, P60-Db2]	Hourly heat input records [F30] Emissions monitoring records [F30, P60-Db3]	Report heat input quarterly [F37, P60-Db-4] Report excess emissions and permit deviations [F37]
CO	25.90 lb/hr [F9]	WAQSR Ch 6, Sec 2 Permit CT-1043	Testing if required [F14]	Test once during permit term (every five years), or every 8,000 hours [F21]	Testing and hours of operation records [F25]	Test report [F33] Report excess emissions and permit deviations [F37]
Various	Project emission levels [F40]	WAQSR Ch 6, Sec 2 Permit MD-10171	Testing if required [F14]	Project monitoring [F41]	Project recordkeeping [F43 and F45]	Report excess emissions and permit deviations [F37] Project notifications [F42] Project reports [F44]
HAPs	WAQSR Ch 6, Sec 3 and 40 CFR 63 Subpart DDDDD					

Source ID#: 27 Source Description: **Emergency Boiler Feed Water Pump Engine (Diesel-Fired)**

Pollutant	Emissions Limit/Work Practice Standard	Corresponding Regulation(s)	Testing Requirements	Monitoring Requirements	Recordkeeping Requirements	Reporting Requirements
Particulate	30 percent opacity [F3]	WAQSR Ch 3, Sec 2	Testing if required [F14]	None	Record monitoring and any test results [F25]	Monitoring results [F34] Report excess emissions and permit deviations [F37]
HAPs	WAQSR Ch 5, Sec 3 and 40 CFR 63 Subpart ZZZZ					

These tables are intended only to highlight and summarize applicable requirements for each source. The corresponding permit conditions, listed in brackets, contain detailed descriptions of the compliance requirements. Compliance with the summary conditions in these tables may not be sufficient to meet permit requirements. These tables may not reflect all emission sources at this facility.

Source ID#: 28 Source Description: **Cummins M11-P Emergency Firewater Pump Engine (Diesel-Fired)**

Pollutant	Emissions Limit/Work Practice Standard	Corresponding Regulation(s)	Testing Requirements	Monitoring Requirements	Recordkeeping Requirements	Reporting Requirements
Particulate	30 percent opacity [F3] 2000 hours of operation per year. Maintain unit. [F10]	WAQSR Ch 3, Sec 2, and Ch 6, Sec 2 waiver wv-11961	Testing if required [F14]	Quarterly Method 9 [F15] Maintain/operate an hours of operation meter [F22]	Record any test results [F25] Maintenance and hours of operation records [F31]	Report annual hours of operation [F34] Report excess emissions and permit deviations [F37]
NO _x	5.0 gr/hp-hr, 2.7 lb/hr and 2.7 TPY [F10]	WAQSR Ch 6, Sec 2 waiver wv-11961	Testing if required [F14]	Test every three years [F22]	Test records [F25]	Test results and non-compliance [F33] Report excess emissions and permit deviations [F37]
CO	2.6 gr/hp-hr, 1.4 lb/hr and 1.4 TPY [F10]	WAQSR Ch 6, Sec 2 waiver wv-11961	Testing if required [F14]	Test every three years [F22]	Test records [F25]	Test results and non-compliance [F33] Report excess emissions and permit deviations [F37]
HAPs	WAQSR Ch 5, Sec 3 and 40 CFR 63 Subpart ZZZZ					

Source ID#: 29 Source Description: **John Deere JU6H-UFADNG Clark Emergency Firewater Pump Engine (Diesel-Fired)**

Pollutant	Emissions Limit/Work Practice Standard	Corresponding Regulation(s)	Testing Requirements	Monitoring Requirements	Recordkeeping Requirements	Reporting Requirements
Particulate	30 percent opacity [F3] 50 hours of operation per year. Maintain unit. [F10]	WAQSR Ch 3, Sec 2, and Ch 6, Sec 2 waiver wv-12054	Testing if required [F14]	Maintain/operate an hours of operation meter [F22]	Record any test results [F25] Records of maintenance, hours of operation, Tier 3 certification. [F31]	Monitoring results [F34] Report excess emissions and permit deviations [F37]
NO _x , CO, NMHC, PM	WAQSR Ch 5, Sec 2 and 40 CFR 60 Subpart III, as applicable					
HAPs	WAQSR Ch 5, Sec 3 and 40 CFR 63 Subpart ZZZZ					

These tables are intended only to highlight and summarize applicable requirements for each source. The corresponding permit conditions, listed in brackets, contain detailed descriptions of the compliance requirements. Compliance with the summary conditions in these tables may not be sufficient to meet permit requirements. These tables may not reflect all emission sources at this facility.

Source ID#: 30 Source Description: Cummins KTTA50-G2 Emergency Generator Engine (Diesel-Fired)

Pollutant	Emissions Limit/Work Practice Standard	Corresponding Regulation(s)	Testing Requirements	Monitoring Requirements	Record keeping Requirements	Reporting Requirements
Particulate	30 percent opacity [F3] 250 hours of operation per year. Maintain unit. [F10]	WAQSR Ch 3, Sec 2, and Ch 6, Sec 2 waiver AP-2532	Testing if required [F14]	Maintain/operate an hours of operation meter [F22]	Record any test results [F25] Maintenance and hours of operation records [F31]	Report annual hours of operation [F34] Report excess emissions and permit deviations [F37]
HAPs	WAQSR Ch 5, Sec 3 and 40 CFR 63 Subpart ZZZZ					

Source ID#: 34 Source Description: Cummins KTTA50-G2 Emergency Generator Engine (Natural Gas Fired)

Pollutant	Emissions Limit/Work Practice Standard	Corresponding Regulation(s)	Testing Requirements	Monitoring Requirements	Record keeping Requirements	Reporting Requirements
Particulate	20 percent opacity [F3] 250 hours of operation per year. Maintain unit. [F10]	WAQSR Ch 3, Sec 2, and Ch 6, Sec 2 waiver AP-10572	Testing if required [F14]	Natural gas firing [F15] Maintain and operate hours meter [F22]	Record any test results [F25] Record hours of operation [F31]	Report fuel type and annual hours of operation [F34] Report excess emissions and permit deviations [F37]
NO _x	7.6 gr/hp-hr, 3.1 lb/hr and 0.8 TPY [F10]	WAQSR Ch 6, Sec 2 waiver AP-10572;	Testing if required [F14]	Test every three years [F22]	Test records [F25]	Test results and non-compliance [F33] Report excess emissions and permit deviations [F37]
CO	19.8 gr/hp-hr, 8.1 lb/hr and 2.0 TPY [F10]	WAQSR Ch 6, Sec 2 waiver AP-10572;	Testing if required [F14]	Test every three years [F22]	Test records [F25]	Test results and non-compliance [F33] Report excess emissions and permit deviations [F37]
VOC	0.4 gr/hp-hr, 0.2 lb/hr and <0.1 TPY [F10]	WAQSR Ch 6, Sec 2 waiver AP-10572;	Testing if required [F14]	Test every three years [F22]	Test records [F25]	Test results and non-compliance [F33] Report excess emissions and permit deviations [F37]
NO _x , CO, VOC	WAQSR Ch 5, Sec 2 and 40 CFR 60 Subpart JJJJ					
HAPs	WAQSR Ch 5, Sec 2 and 40 CFR 60 Subpart JJJJ and WAQSR Ch 5, Sec 3 and 40 CFR 63 Subpart ZZZZ					

These tables are intended only to highlight and summarize applicable requirements for each source. The corresponding permit conditions, listed in brackets, contain detailed descriptions of the compliance requirements. Compliance with the summary conditions in these tables may not be sufficient to meet permit requirements. These tables may not reflect all emission sources at this facility.

ABBREVIATIONS
(Modified July 21, 2014)

ACFM	Actual cubic feet per minute
AFRC	Air-fuel ratio controls
AQD	Air Quality Division
BACT	Best available control technology (see Definitions)
Btu	British Thermal Unit
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CFR	Code of Federal Regulations
CO	Carbon monoxide
CO_{2e}	Carbon dioxide equivalent
DEQ	Wyoming Department of Environmental Quality
EPA	United States Environmental Protection Agency (see Definitions)
ESP	Electrostatic Precipitator
g/hp-hr	Gram(s) per horsepower hour
gal	Gallon(s)
gr	Grain(s)
H ₂ S	Hydrogen sulfide
HAP(s)	Hazardous air pollutant(s)
hp	Horsepower
hr	Hour(s)
lb	Pound(s)
M	Thousand
MACT	Maximum available control technology (see Definitions)
mfr	Manufacturer
mg	Milligram(s)
MM	Million
MVACs	Motor vehicle air conditioners
NMHC(s)	Non-methane hydrocarbon(s)
NO _x	Oxides of nitrogen
NSCR	Non-selective catalytic reduction
O ₂	Oxygen
PM	Particulate matter
PM ₁₀	Particulate matter less than or equal to a nominal diameter of 10 micrometers
PSD	Prevention of Significant Deterioration
ppmv	Parts per million (by volume)
ppmw	Parts per million (by weight)
QIP	Quality Improvement Plan
RICE	Reciprocating internal combustion engine
SCF	Standard cubic foot (feet)
SCFD	Standard cubic foot (feet) per day
SCM	Standard cubic meter(s)
SIC	Standard Industrial Classification
SO ₂	Sulfur dioxide
SO _x	Oxides of sulfur
TPD	Ton(s) per day (1 ton = 2000 pounds, unless otherwise specified)
TPH	Ton(s) per hour (1 ton = 2000 pounds, unless otherwise specified)
TPY	Tons per year (1 ton = 2000 pounds, unless otherwise specified)
U.S.C.	United States Code
µg	Microgram(s)
VOC(s)	Volatile organic compound(s)
W.S.	Wyoming Statute
WAQSR	Wyoming Air Quality Standards & Regulations (see Definitions)

DEFINITIONS

"Act" means the Clean Air Act, as amended, 42 U.S.C. 7401, *et seq.*

"Administrator" means Administrator of the Air Quality Division, Wyoming Department of Environmental Quality.

"Applicable requirement" means all of the following as they apply to emissions units at a source subject to Chapter 6, Section 3 of the WAQSR (including requirements with future effective compliance dates that have been promulgated or approved by the EPA or the State through rulemaking at the time of issuance of the operating permit):

- (a) Any standard or other requirement provided for in the Wyoming implementation plan approved or promulgated by EPA under title I of the Act that implements the relevant requirements of the Act, including any revisions to the plan promulgated in 40 CFR Part 52;
- (b) Any standards or requirements in the WAQSR which are not a part of the approved Wyoming implementation plan and are not federally enforceable;
- (c) Any term or condition of any preconstruction permits issued pursuant to regulations approved or promulgated through rulemaking under title I, including parts C or D of the Act and including Chapter 5, Section 2 and Chapter 6, Sections 2 and 4 of the WAQSR;
- (d) Any standard or other requirement promulgated under Section 111 of the Act, including Section 111(d) and Chapter 5, Section 2 of the WAQSR;
- (e) Any standard or other requirement under Section 112 of the Act, including any requirement concerning accident prevention under Section 112(r)(7) of the Act and including any regulations promulgated by EPA and the State pursuant to Section 112 of the Act;
- (f) Any standard or other requirement of the acid rain program under title IV of the Act or the regulations promulgated thereunder;
- (g) Any requirements established pursuant to Section 504(b) or Section 114(a)(3) of the Act concerning enhanced monitoring and compliance certifications;
- (h) Any standard or other requirement governing solid waste incineration, under Section 129 of the Act;
- (i) Any standard or other requirement for consumer and commercial products, under Section 183(e) of the Act (having to do with the release of volatile organic compounds under ozone control requirements);
- (j) Any standard or other requirement of the regulations promulgated to protect stratospheric ozone under title VI of the Act, unless the EPA has determined that such requirements need not be contained in a title V permit;
- (k) Any national ambient air quality standard or increment or visibility requirement under part C of title I of the Act, but only as it would apply to temporary sources permitted pursuant to Section 504(e) of the Act; and
- (l) Any state ambient air quality standard or increment or visibility requirement of the WAQSR.
- (m) Nothing under paragraphs (A) through (L) above shall be construed as affecting the allowance program and Phase II compliance schedule under the acid rain provision of Title IV of the Act.

"BACT" or "Best available control technology" means an emission limitation (including a visible emission standard) based on the maximum degree of reduction of each pollutant subject to regulation under the WAQSR or regulation under the Federal Clean Air Act, which would be emitted from or which results for any proposed major emitting facility or major modification which the Administrator, on a case-by-case basis, taking into account energy, environmental, and economic impacts and other costs, determines is achievable for such source or modification through application or production processes and available methods, systems, and techniques, including fuel cleaning or treatment or innovative fuel combustion techniques for control of such pollutant. If the Administrator determines that technological or economic limitations on the application of measurement methodology to a particular class of sources would make the imposition of an emission standard infeasible, he may instead prescribe a design, equipment, work practice or operational standard or combination thereof to satisfy the requirement of Best Available Control Technology. Such standard shall, to the degree possible, set forth the emission reduction achievable by implementation of such design, equipment, work practice, or operation and shall provide for compliance by means which achieve equivalent results. Application of BACT shall not result in emissions in excess of those allowed under Chapter 5, Section 2 of the WAQSR and any other new source

performance standard or national emission standards for hazardous air pollutants promulgated by EPA but not yet adopted by the state.

"Department" means the Wyoming Department of Environmental Quality or its Director.

"Director" means the Director of the Wyoming Department of Environmental Quality.

"Division" means the Air Quality Division of the Wyoming Department of Environmental Quality or its Administrator.

"Emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

"EPA" means the Administrator of the U.S. Environmental Protection Agency or the Administrator's designee.

"Fuel-burning equipment" means any furnace, boiler apparatus, stack, or appurtenances thereto used in the process of burning fuel or other combustible material for the purpose of producing heat or power by indirect heat transfer.

"Fugitive emissions" means those emissions which could not reasonably pass through a stack chimney, vent, or other functionally equivalent opening.

"Insignificant activities" means those activities which are incidental to the facility's primary business activity and which result in emissions of less than one ton per year of a regulated pollutant not included in the Section 112 (b) list of hazardous air pollutants or emissions less than 1000 pounds per year of a pollutant regulated pursuant to listing under Section 112 (b) of the Act provided, however, such emission levels of hazardous air pollutants do not exceed exemptions based on insignificant emission levels established by EPA through rulemaking for modification under Section 112 (g) of the Act.

"MACT" or "Maximum achievable control technology" means the maximum degree of reduction in emissions that is deemed achievable for new sources in a category or subcategory that shall not be less stringent than the emission control that is achieved in practice by the best controlled similar source, as determined by the Administrator. Emission standards promulgated for existing sources in a category or subcategory may be less stringent than standards for new sources in the same category or subcategory but shall not be less stringent, and may be more stringent than:

- (a) the average emission limitation achieved by the best performing 12 percent of the existing sources (for which the Administrator has emission information), excluding those sources that have, within 18 months before the emission standard is proposed or within 30 months before such standard is promulgated, whichever is later, first achieved a level of emission rate or emission reduction which complies, or would comply if the source is not subject to such standard, with the lowest achievable emission rate applicable to the source category and prevailing at the time, in the category or subcategory for categories and subcategories with 30 or more sources, or
- (b) the average emission limitation achieved by the best performing five sources (for which the Administrator has or could reasonably obtain emissions information) in the category or subcategory for categories or subcategories with fewer than 30 sources.

"Modification" means any physical change in, or change in the method of operation of, an affected facility which increases the amount of any air pollutant (to which any state standards applies) emitted by such facility or which results in the emission of any such air pollutant not previously emitted.

"Permittee" means the person or entity to whom a Chapter 6, Section 3 permit is issued.

"Potential to emit" means the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored or processed, shall be treated as part of its design if the limitation is enforceable by EPA and the Division. This term does not alter or affect the use of this term for any other purposes under the Act, or the term "capacity factor" as used in title IV of the Act or the regulations promulgated thereunder.

"Regulated air pollutant" means the following:

- (a) Nitrogen oxides (NO_x) or any volatile organic compound;
- (b) Any pollutant for which a national ambient air quality standard has been promulgated;
- (c) Any pollutant that is subject to any standard established in Chapter 5, Section 2 of the WAQSR or Section 111 of the Act;
- (d) Any Class I or II substance subject to a standard promulgated under or established by title VI of the Act; or
- (e) Any pollutant subject to a standard promulgated under Section 112 or other requirements established under Section 112 of the Act, including Sections 112(g), (j), and (r) of the Act, including the following:
 - (i) Any pollutant subject to requirements under Section 112(j) of the Act. If EPA fails to promulgate a standard by the date established pursuant to Section 112(e) of the Act, any pollutant for which a subject source would be major shall be considered to be regulated on the date 18 months after the applicable date established pursuant to Section 112(e) of the Act; and
 - (ii) Any pollutant for which the requirements of Section 112(g)(2) of the Act have been met, but only with respect to the individual source subject to Section 112(g)(2) requirement.
- (f) Pollutants regulated solely under Section 112(r) of the Act are to be regulated only with respect to the requirements of Section 112(r) for permits issued under this Chapter 6, Section 3 of the WAQSR.

"Renewal" means the process by which a permit is reissued at the end of its term.

"Responsible official" means one of the following:

- (a) For a corporation:
 - (i) A president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation; or
 - (ii) A duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either:
 - (A) the facilities employ more than 250 persons or have gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars); or
 - (B) the delegation of authority to such representative is approved in advance by the Division;
- (b) For a partnership or sole proprietorship: a general partner or the proprietor, respectively;
- (c) For a municipality, State, Federal, or other public agency: Either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency; or
- (d) For affected sources:
 - (i) The designated representative or alternate designated representative in so far as actions, standards, requirements, or prohibitions under title IV of the Act or the regulations promulgated thereunder are concerned; and
 - (ii) The designated representative, alternate designated representative, or responsible official under Chapter 6, Section 3 (b)(xxvi) of the WAQSR for all other purposes under this section.

"WAQSR" means the Wyoming Air Quality Standards and Regulations promulgated under the Wyoming Environmental Quality Act, W.S. §35-11-101, *et seq.*

Appendix A – B
Reserved (Modified July 21, 2014)



Appendix C
Compliance Assurance Monitoring Plan

SIMPLIT PHOSPHATES LLC – ROCK SPRINGS, WYOMING
Compliance Assurance Monitoring Plan For Applicable Sources -
Revision 4

SOURCE 9A – LURGI SULFURIC ACID PLANT.

A. Emissions Unit

Description: Lurgi Sulfuric Acid Plant
 Identification: Source 9a
 Facility: Rock Springs Fertilizer Complex
 Pollutants Emitted: SO₂, H₂SO₄ Mist and NO_x

B. Applicable Regulation, Emission Limits, and Monitoring Requirements

Regulation: 40 CFR 60 Subpart H
 CAM Emission Limits: For emissions of sulfur dioxide, the unit is equipped with a CEMS. The use of a CEMS is satisfactory for meeting CAM monitoring requirements under WAQSR Chapter 7, Section 3(c)(iv). There are no add on devices for control of NO_x emissions. **CAM does apply for H₂SO₄ mist.**
 Pre-CAM Requirements: Annual source testing for emissions of sulfur dioxide. Permit term source testing for emissions of H₂SO₄ mist and NO_x.
 Proposed CAM Monitoring: Daily “see / no see” visible emissions monitoring to address H₂SO₄ mist pollutant. Observations to be conducted for at least one minute. Presence of opacity will trigger corrective action. Reporting of excursions done quarterly.

C. Control Technology, Capture System, Bypass, PTE:

Controls: High Efficiency Mist Eliminators (Candle Filters)
 Capture System: Closed-duct system (cannot be by-passed)
 PTE before controls: >100 TPY for emissions of H₂SO₄ mist at efficiency estimate of 96-98%.
 PTE after controls: 10.5 TPY

D. Justification for Proposed Monitoring:

Opacity from source is usually due to the presence of sulfur trioxide / sulfuric acid mist. Daily visible emissions monitoring will help ensure that the process is operating properly.

SOURCE 9B – MEC SULFURIC ACID PLANT.

A. Emissions Unit

Description: MEC Sulfuric Acid Plant
 Identification: Source 9b
 Facility: Rock Springs Fertilizer Complex
 Pollutants Emitted: SO₂, H₂SO₄ Mist and NO_x

B. Applicable Regulation, Emission Limits, and Monitoring Requirements

Regulation: 40 CFR 60 Subpart H
CAM Emission Limits: For emissions of sulfur dioxide, the unit is equipped with a CEMS. The use of a CEMS is satisfactory for meeting CAM monitoring requirements under WAQSR Chapter 7, Section 3(c)(iv). There are no add on devices to control emissions of NO_x. **CAM does apply for H₂SO₄ mist.**
Pre-CAM requirements: Annual source testing for emissions of sulfur dioxide. Permit term source testing for emissions of H₂SO₄ mist and NO_x.
Proposed CAM Monitoring: Daily "see / no see" visible emissions monitoring to address H₂SO₄ mist pollutant. Observations to be conducted for at least one minute. Presence of opacity will trigger corrective action. Reporting of excursions done quarterly.

C. Control Technology, Capture System, Bypass, PTE:

Controls: High Efficiency Mist Eliminators (Candle Filters)
Capture System: Closed-duct system (cannot be by-passed)
PTE before controls: >100 TPY for emissions of H₂SO₄ mist at an efficiency estimate of 96-98%.
PTE after controls: 6.2 TPY

D. Justification for Proposed Monitoring:

Opacity from source is usually due to the presence of sulfur trioxide / sulfuric acid mist. Daily visible emissions monitoring will help ensure that the process is operating properly.

SOURCE 10A – AMMONIUM PHOSPHATE PLANT.

A. Emissions Unit

Description: Ammonium Phosphate Plant
Identification: Source 10a
Facility: Rock Springs Fertilizer Complex
Pollutants Emitted: Fluoride, NH₃ and Particulate

B. Applicable Regulation, Emission Limits, and Monitoring Requirements

Regulation: 40 CFR 63 Subpart BB & WAQSR Chapter 5, Section 3
CAM Emission Limits: Source is exempt from CAM for fluoride and NH₃. **CAM applies for particulate matter.**
Pre-CAM requirements: Annual source testing for all pollutants. Continuous monitoring of scrubbing system liquor flow and differential pressure.
Proposed CAM Monitoring: The National Emission Standards for Hazardous Air Pollutants (NESHAP) for hydrogen fluoride from Phosphate fertilizer manufacturing plants requires subject facilities to continuously monitor applicable scrubbing system differential pressure and liquor flow. For the ammonium phosphate plant, this is codified under 40CFR63, Subpart BB.

08-27-2010 320125

Simplot Phosphates LLC has been conducting this required monitoring and associated record keeping and reporting since 2001 per methodology approved by WDEQ/AQD. Differential pressure and liquor flow parameter ranges are established annually along with operating permit required source testing for emissions of fluoride. The basis of the NESHAP monitoring was that EPA believed the parameters of differential pressure and liquor flow are adequate performance indicators of most scrubbing systems. It is proposed that this monitoring will satisfy CAM for emissions of particulate matter.

An excursion from the ranges established annually during fluoride (NESHAP) source testing will trigger corrective action with reporting of excursions done quarterly. Monitoring will be based upon 15-minute block averages and excursion reporting will be based upon a 3-hour rolling average of the 15-minute blocks.

C. Control Technology, Capture System, Bypass, PTE:

Controls:	Packed Tower Scrubber with Demister
Capture System:	Closed-duct system (cannot be by-passed)
PTE before controls:	>100 TPY for emissions of particulate matter at 99% efficiency.
PTE after controls:	5.6 TPY

D. Justification for Proposed Monitoring:

The scrubbing system for source 10A is designed to control NH₃, fluoride and particulate emissions. The NESHAP parameter monitoring for emissions of fluoride (HF) has ensured consistent performance of this system. Therefore, it stands to reason that the same parameter monitoring will consistently control emissions of particulate matter. High and low values for pressure drop and +/- 20% liquor flow range will continue to be established annually during fluoride source testing per established NESHAP procedures.

SOURCE 12 – AMMONIUM PHOSPHATE LOADOUT BAGHOUSE.

A. Emissions Unit

Description:	Ammonium Phosphate Loadout Bag House
Identification:	Source 12
Facility:	Rock Springs Fertilizer Complex
Pollutants Emitted:	Particulate Matter

B. Applicable Regulation, Emission Limits, and Monitoring Requirements

Regulation:	WAQSR Chapter 3, Section 2
CAM Emission Limits:	CAM applies for particulate matter.
Pre-CAM requirements:	None.
Proposed CAM Monitoring:	Daily "see / no see" visible emissions monitoring. Observations to be conducted for at least one minute.

C. Control Technology, Capture System, Bypass, PTE:

Controls:	Pulse Jet Bag House
Capture System:	Closed bag house system
PTE before controls:	438 TPY at 99% efficiency.
PTE after controls:	1.1 TPY

D. Justification for Proposed Monitoring:

Because this is such a small bag house controlled source that normally does not exhibit visible emissions, it is believed that daily visible emission monitoring will be adequate to ensure consistent performance of the bag house. If visible emissions are noted, corrective action will be taken.

40 CFR Subpart AA and BB Startup, Shutdown and Malfunction Plans

Sources 1a, 1a' and 1b – Phosphoric Acid Plants (Subpart AA)

The 1a, 1a' and 1b fume scrubbing systems simply collect fumes from various vessels, sumps and filter tables in the plant phosphoric acid plant, but emissions are not directly related to plant rates. The following procedures will be followed by plant operators when a scrubbing system malfunction occurs.

1. For the 1a/1a' (Badger Plant) systems, check the scrubber pumps (PP-1307a/s) and confirm they are operating correctly. For the 1b (Mustang Plant) system, check the PP-6309 a/s pumps.
2. Check to see if the applicable flow meter instrumentation is reading properly.
3. Check stack drains and confirm they are not plugged.
4. Complete the pm procedure's for the scrubbers including:
 - Check sprays for operation in the venturi, cyclonic and separator sections.
 - Check the demisters for pluggage or damage.
 - Check the drains for pluggage in the venturi, cyclonic and separator sections.
5. Check the Delta P's across the scrubbers. Verify instrumentation is working properly. If the Delta P has fallen low, check the fan to see if the fan damper position has changed or if there is a problem with the fan belts.
6. Check the positions of the various slide gates, especially those above the filter tables, to make sure they have not been closed.

Startup and shutdown procedures as outlined in the phosphoric acid plant operating manual should be followed.

11-06-2008 320125

Revised October 2, 2008

Source 2 – Superphosphoric Acid Plant (Subpart AA)

The SPA plant fume scrubbing system simply collects fumes from various vessels, sumps etc. in the plant, but emissions are not directly related to the batch process rates. However, the following procedures will be followed by plant operators when a fume scrubbing system malfunction occurs:

1. Check discharge pressures on the 1st and 2nd stage scrubber pumps PP-2760 and PP-2766. The discharge pressure should be running between 40 & 80 pounds. If the discharge pressure is less than 40 pounds, the pump should be pulled and pump suctions checked to see if they are plugged.
2. Check the duct work coming from the repulp sump to make sure it is clear of buildup which may decrease air flow.
3. Check the water levels in the first stage and second stage scrubbers.
 - A. The level in the first stage scrubber should be running at the over flow point.
 - B. The level in the second stage should be running at approximately one inch above the bottom of the draft tube.
 - C. Pull samples from the first and second stages for fluoride analysis.
4. Check slide gates on all vessels that the scrubber system pulls fumes from.
 - A. Adjust slide gates so that no noticeable fumes are detected leaving the vessels.
 - B. If any slide gates are missing, replace them.
5. Check all sprays on the system to make sure they are working properly.
6. Check Delta P across the scrubber to make sure it is within current operating parameters.
 - A. If the Delta P is not within the established parameters, it can be adjusted by changing the setting of the slide gate to the duct drawing from the repulp sump and/or by adjusting make up water to the system.
 - B. If the Delta P cannot be controlled, the I&E department may need to check the instrumentation and the system pm should be checked or conducted again. Check with the North plant superintendent or the environmental department for assistance.

Startup and shutdown procedures as outlined in the super-phosphoric acid plant operating manual should be followed.

Source 10a - Ammonium Phosphate Plant (Subpart BB)

Following is a general description of what measures should be taken if a malfunction in the ammonium phosphate plant scrubbing system occurs:

1. Check the level in the reactor to make sure it is at least 65 percent.
2. Check the recycle tank level and make sure it is at least 85%. Check the level indication and climb up to the top of the tank to do a visual check. If below 85%, add water and/or acid in order to maintain proper level and pH (i.e., 4 to 7 per item 4 below).
3. Check the scrubber lines with the laser temperature gun to see if any lines are obviously plugged. Unplug lines as necessary.
4. Check the pH of the tailgas scrubber. The pH should be in the range of 4 to 7. If it is above 7, it can be decreased by adding more phosphoric acid to the scrubbers. This condition would most likely be caused by excessive carryover from the reactor. If the pH is less than 4, the tailgas scrubber water should be dumped to the sump and new make up water added. This condition could be caused by the tailgas scrubber water not having been dumped after an acid wash.
5. Check the tailgas scrubber delta P reading to make sure it is in the 4 – 12 range (range will change annually). If it is greater than 12, put the tailgas scrubber on an acid wash. If problems persist, shut down to check demister pads. Clean and repair demister pads as needed. This condition is likely caused by solids accumulation in saddle packing and/or demister pads. If the delta P is less than 4, shut down the plant and replace packing on demister pads. This condition is likely caused by a large hole in the saddle packing and demister pad.
6. If opacity (indicating malfunction) still exists after going through the systems checks outlined above, go back to the reactor and recheck both the sonic level indication and do a visual level check. If a 65% plus level is verified, inspect the feed tubes to determine if they have been damaged. Repair these tubes as needed.

Note: As part of normal operations of this plant, it is periodically necessary to do a "reversal" of the granulator (the granulator is the section of the plant where the actual fertilizer pellet is built). A reversal is when the granulator is stopped and rotated back in the opposite direction for a short period of time to allow excessive build up and lumps of fertilizer to be removed and/or broken up. This process does promote excessive particulate loading of the scrubbing and opacity does often result. A reversal normally takes approximately 15 minutes and the resulting opacity normally does not persist for more than 30 minutes. This opacity is estimated at less than 20%.

Startup and shutdown procedures as outlined in the ammonium phosphate plant operating manual should be followed.

11-06-2008 320125

Revised October 2, 2008

Appendix D – L
Reserved (Modified July 21, 2014)

Appendix M
Fluoride Control Techniques

Simplot Phosphates LLC Phosphogypsum Storage Area Fluoride Control Techniques Document August 2008

BACKGROUND SUMMARY

SF Phosphates Limited Company (SFP) was out of compliance with WAQSR chapter 2, section 9 (a)(ii) regional ambient air fluoride standards, as administered, during the summers of 1994, 1995, and 1996. As a result of this matter, a compliance order and NOV was issued to the company on November 15, 1995 (Docket #2717-95). In summary, this NOV required SFP to evaluate the sources and causes of the increased fluoride emissions during these years and develop a plan of corrective action. After much investigation and research, the company put together a comprehensive fluoride remediation plan which focused on the phosphogypsum storage area (hereafter "PSA") as the primary source of the increased fluoride emissions. This plan was submitted to the WDEQ/AQD in November of 1996. The unique and innovative techniques within this plan were successfully implemented and compliance was achieved during the summer of 1997 at a cost of approximately \$1.3 million.

PSA's are a necessary part of phosphate fertilizer production. The Environmental Protection Agency (EPA) states in 40 CFR 61.202:

Each person who generates phosphogypsum shall place all phosphogypsum in stacks...

Prior EPA approval is required before using phosphogypsum for purposes other than those identified in Subpart R of 40 CFR 61.

In the summer of 2007, the earth work and synthetic lining system for a 125 acre expansion of the PSA was completed. Normal operations include changes in the footprint of the stack to adhere to height/stability limits. To address these issues it is necessary to pre-build areas for additional storage. We believe that this additional area will provide additional options to decrease fluoride emissions during the summer months as noted below. The construction of the phosphogypsum dike surrounding this new area is currently underway and should be completed sometime in 2010.

The WDEQ-AQD has asked for additional information under Permit Application No. AP-7283 and we believe that this updated fluoride remediation plan provides

that requested information. This updated plan will also be included in our upcoming operating permit application.

It is the goal and intent of Simplot to maintain compliance with the applicable WAQSR chapter 2, section 9 standards. However, Simplot has a number of legitimate concerns regarding the stringency and applicability of these standards and it is the company's desire to seek future changes to those standards. Simplot is happy to report that after over 22 years of operation, no adverse environmental impacts have occurred as a result of fluoride emissions from the Rock Springs Fertilizer Complex.

INTRODUCTION

This document will list the fluoride control techniques that were used to some extent at the Rock Springs facility from 1997 - 2007 and allowing the company to achieve compliance with WAQSR Chapter 2, Section 9 (a)(ii) regional ambient air standards with a few noted exceptions in July of 2007 and April of 2008. Some techniques that are no longer used have been eliminated from this updated version.

Please note that this document is a revision to the original version submitted by SF Phosphates back in 1998. Simplot became the sole owner of the facility in November of 2004. Simplot has spent considerable time, effort and money in achieving this initial success. We believe that these techniques will continue to be successful in future years. Simplot has discussed these techniques with the WDEQ/AQD on numerous occasions and believe the AQD has a reasonably good understanding of how they are implemented and of some of the potential pitfalls that are inherent due to the dynamic nature of the PSA. The PSA is an integral part of the overall facility water balance that is sometimes difficult to maintain.

CORE FLUORIDE CONTROL TECHNIQUES

- *Rim Ditch (cell) Building Technique* - This technique allows wider phosphogypsum storage cells to be constructed so that more dike building gypsum material can be stored in each cell. This larger cell building has become the standard operating procedure. Each individual cell does not have to be disturbed as often which facilitates lower fluoride emissions in itself because new surfaces are created with less frequency. In addition, when these wider cells are disturbed for dike building, a larger lift can be built so that the entire stack goes up quicker. This might allow construction to be limited or ceased during certain critical summer periods in the future as our new area becomes operational.

- Keeping Phosphogypsum Areas Active (wetted) – The idea behind this technique was to keep the four main (current) storage areas in operation simultaneously through efforts to keep water ponds on portions of these areas and to keep the remaining areas of the stacks uniformly wetted. This water ponding and uniform wetting is achieved through the use of weirs and by alternately discharging phosphogypsum slurry from various corners of the stacks. The large increase in temperature on the surface of the PSA during the summer months (measured in excess of 120 degrees F) equates to increases in evaporation rates as well. This evaporation means that PSA surfaces will dry out more rapidly which, in turn, means that fluoride emissions will increase as this drying process occurs. By keeping portions the PSA wetted, surface temperatures are lower, which should result in lower fluoride emissions. The more current thinking regarding this management technique still holds true from the standpoint of surface temperatures, but we try and manage this in the summer months so that the stacks don't go through a drying process, but not to the extent that water is ponded because more HF is driven off the free water areas as surface temperature increases.
- Limit Dike Building, Material Hauling and Water Surface Area During Critical Periods - This technique employs an accelerated building strategy in the spring and fall time periods when temperatures, evaporation rates, and fluoride emission rates are lower due to lower surface temperatures. Material handling will be stopped first as this activity spreads material out over long distances and creates new emitting surfaces in the process. If enough additional storage area is created in the spring and fall, then dike building can be decreased or even temporarily ceased during portions of the more critical summer months when fluoride emissions are higher. If more water can be ponded and evaporated during the cooler periods, then a better water balance might be achieved so ponded water can be minimized during the summer. This technique is limited by the storage margin necessary to maintain a stable stack, but should allow additional flexibility in the future as the new area is placed fully into service (anticipated 2010). Please note that the overall stability of the stacked phosphogypsum is paramount and Simplot will conduct all operations with safety and long term business liability in the forefront of our thinking. A failure of one of the stacked areas has happened within our industry and would be devastating to our business and a serious environmental and safety concern. Please note that limited activity is currently not possible as continuous dike building must be conducted on the developed areas of the PSA in order to keep up with the current production of phosphogypsum.

- Surface Application of Slaked Lime - Slaked lime is applied to accessible surfaces of the PSA with a specially equipped truck. The lime material neutralizes fluoride on the surface of the phosphogypsum and also provides a reflective coating which decreases the temperature of the surface it has been applied to. This technique is timed for maximum benefit because all of the active areas of the stack are new every four to six weeks and thus, lime applied too early is covered over with new phosphogypsum and would not be as effective when needed (standards are measured against on a rolling average basis). The lime is applied to the permanent surfaces within the PSA based on meteorological conditions prior to the critical summer months. The active areas are treated based on meteorological conditions and the stage of the building process the particular area is in. Any residual lime covered over should still have some positive effect, but appropriate timing of the surface application should produce the maximum benefit.
- Soil Capping and Vegetation Application - Simplot has covered approximately 40 acres of non-active or permanent areas of the PSA with soil and reclaimed this area with vegetation. This technique effectively seals these areas of the phosphogypsum dikes from emitting fluoride and will provide a template for post closure reclamation. We believe we have achieved some success with this technique and approximately 40-50 more acres will be ready for soil cap and vegetation within the next two years

FLUORIDE REMOVAL STRATEGY

- Fluorosilicic Acid (FSA) Recovery - Due to the complex chemistry within the phosphogypsum storage area and the unpredictable meteorological conditions around the Rock Springs site, Simplot has shifted much of our focus regarding fluoride to removal of the fluoride prior to being placed into the PSA.

Simplot installed a fluorosilicic acid recovery process and began production of this material in February of 2006. This process eliminates approximately 4,500 tpy of fluoride (24,000 tons of 24% FSA) from ever entering the phosphogypsum storage area by taking a fluoride waste stream from the Mustang D-Evaporator that had been going to the PSA and processing that stream into a useable water fluoridation product.

Simplot has plans to recover additional FSA as part of a planned reactor replacement project that will eliminate approximately 4,500 additional tpy of fluoride (production of FSA up to approximately 48,000 tpy) from entering the PSA. In addition, new fluoride recovery products will be evaluated as part of the longer term expansion plans of the facility. This fluoride recovery idea is

difficult to quantify into emissions decreases due to the complex chemistry and the unpredictable meteorological conditions, but Simplot believes this to be a positive and long term method of removing fluoride. A basic fluoride balance is provided below to better illustrate this idea.

PROGRESS REPORTING

The ambient fluoride data is included in the quarterly environmental monitoring reports submitted to the division within 60 days of the end of each calendar quarter. In addition, a separate ambient fluoride report will be submitted annually to the division at the end of each critical time frame (i.e., September – October). Any of this data as well as on site meteorological data are available at any time upon request.

Appendix N
Permit CT-550A3



THE STATE OF WYOMING



JIM GERINGER
GOVERNOR

Department of Environmental Quality

Herschler Building • 122 West 25th Street • Cheyenne, Wyoming 82002

ADMINISTRATION (307) 777-7768 FAX 777-7882	ABANDONED MINES (307) 777-6146 FAX 834-0799	AIR QUALITY (307) 777-7391 FAX 777-5816	INDUSTRIAL SITING (307) 777-7368 FAX 777-8937	LAND QUALITY (307) 777-7766 FAX 834-0799	SOLID & HAZARDOUS WASTE (307) 777-7752 FAX 777-8973	WATER QUALITY (307) 777-7781 FAX 777-8973
--	---	---	---	--	---	---

February 7, 1995

Mr. James M. Williams
Vice President of Operations
SF Phosphates Limited Company
P.O. Box 1789
Rock Springs, WY 82902-1789

Permit No. CT-550A3

Dear Mr. Williams:

The Division of Air Quality of the Wyoming Department of Environmental Quality has completed final review of SF Phosphates Company's application to amend Air Quality Permit CT-550A to incorporate a specific methodology for determining compliance with the Wyoming fluoride in forage standards at the existing SF Phosphates Fertilizer Plant located in Section 15, T18N, R104W, approximately 4.5 miles east southeast of Rock Springs, in Sweetwater County, Wyoming.

Following this agency's proposed approval of the request as published January 4, 1995 and in accordance with Section 21(m) of the Wyoming Air Quality Standards and Regulations, the public was afforded a 30-day period in which to submit comments concerning the proposed new source, and an opportunity for a public hearing. No comments have been received. Therefore, on the basis of the information provided to us, approval to amend the permit for the fluoride monitoring methodology as described in the application is hereby granted pursuant to Section 21 of the regulations with the following conditions:

1. That authorized representatives of the Division of Air Quality be given permission to enter and inspect any property, premise or place on or at which an air pollution source is located or is being constructed or installed for the purpose of investigating actual or potential sources of air pollution, and for determining compliance or non-compliance with any rules, regulations, standards, permits or orders.
2. That all commitments and descriptions set forth in the application for this permit, unless superseded by a specific condition of this permit, are incorporated herein by this reference and are enforceable as conditions of this permit.
3. The method by which SF Phosphates will determine compliance with Wyoming's fluoride in forage standards as set forth in Section 11 (b) of the Wyoming Air Quality Standards & Regulations (WAQS&R) at their Rock Springs phosphate fertilizer production plant, will be to incorporate a "Random Walk" sample averaging method, as described by the following steps.

- a) On a monthly basis, SF Phosphates will continue to collect data from the 47 sites on their current fluoride in forage monitoring network (drawing # D10CI001), and report the fluoride concentrations recorded at each of those stations in a quarterly monitoring report.
- b) SF Phosphates will calculate a "compliance average" of the 31 plots in the 12 mi² core area, which excludes fenced sites #5, #6, #19, #20, #24, #25, #26 & #27, and also excludes expanded sites #40 through #47 located in the 30 mi² impact area. This Raw Monitored Data Average concentration will be compared against the correlated Random Walk Average concentration in Table I of this permit. If the Raw Monitored Data "compliance average" for the month is greater than 143 ppm fluoride, then the potential animal diet is presumed to be greater than the WAQS&R 30 day forage in fluoride standard of 80 ppm and the Rock Springs fertilizer facility will be deemed to have recorded an exceedance of that 30 day fluoride in forage standard.
- c) SF Phosphates will calculate a rolling two-month average from the monthly "compliance averages" described in step b) of this condition. This Raw Monitored Data Average concentration will be compared against the correlated Random Walk Average concentration in Table I of this permit. If the Raw Monitored Data "compliance average" is greater than 106 ppm fluoride, then the potential animal diet is presumed to be greater than the WAQS&R 60 day forage in fluoride standard of 60 ppm and the Rock Springs fertilizer facility will be deemed to have recorded an exceedance of that 60 day fluoride in forage standard.
- d) SF Phosphates will calculate a rolling twelve-month average from the monthly "compliance averages" described in step b) of this condition. This Raw Monitored Data Average concentration will be compared against the correlated Random Walk Average concentration in Table I of this permit. If the Raw Monitored Data "compliance average" is greater than 50 ppm fluoride, then the potential animal diet is presumed to be greater than the WAQS&R annual forage in fluoride standard of 30 ppm and the Rock Springs fertilizer facility will be deemed to have recorded an exceedance of that annual fluoride in forage standard.
- e) At any time the Air Quality Division determines that SF Phosphates has significantly altered the Rock Springs plant fluoride emission sources, or at any time the Air Quality Division determines that SF Phosphates has significantly altered the forage in fluoride monitoring network due to any construction or plant site development, the Division may require SF Phosphates to conduct a revised data comparison analysis. This revised data comparison analysis will be performed according to the data Kriging and Random Walk procedures described in the document, "Proposed Approach for Addressing the Fluoride in Forage Rule at SF Phosphates Facility" by Woodward-Clyde Consultants; September 23, 1994 dated revision.

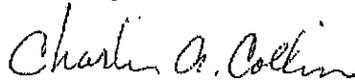
It must be noted that this approval does not relieve you of your obligation to comply with all applicable county, state, and federal standards, regulations or ordinances. Special attention must be given to Section 21 of the Wyoming Air Quality Standards and Regulations. Section 21(a) requires that a permit to operate is required in order to operate a facility after a 120-day start-up period, Section 21(i) requires notification of start-up, Section 21(j) requires that performance tests be conducted within 90 days of initial start-up, and Section 21(h) requires that construction

Mr. James M. Williams
February 7, 1995
Page 3

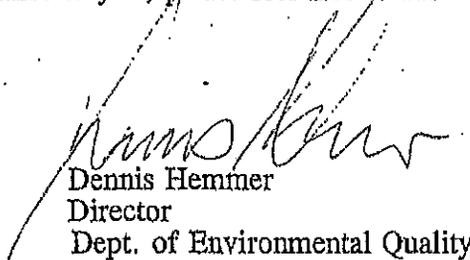
or modification must commence within 24 months of date of permit issuance or the permit will become invalid, unless the Administrator extends such time period based on a satisfactory justification of the requested extension. Any appeal of this permit as a final action of the Department must be made to the Environmental Quality Council within sixty (60) days of permit issuance per Section 16, Chapter I, General Rules of Practice and Procedure, Department of Environmental Quality.

If we may be of further assistance to you, please feel free to contact this office.

Sincerely,



Charles A. Collins
Administrator
Air Quality Division



Dennis Hemmer
Director
Dept. of Environmental Quality

CAC:DH/BJD

Table I
Permit CT-550A3

SF Phosphates Rock Springs Fertilizer Plant - Forage in Fluoride Compliance Table

<u>Random Walk Average (ppm)</u>	<u>Raw Monitored Data Average (ppm)</u>	<u>Random Walk Average (ppm)</u>	<u>Raw Monitored Data Average (ppm)</u>
6	6	50	88
20	32	51	89
21	34	52	91
22	36	53	93
23	38	54	95
24	39	55	97
25	41	56	99
26	43	57	101
27	45	58	102
28	47	59	104
29	49	60	106
30	50	61	108
31	52	62	110
32	54	63	112
33	56	64	113
34	58	65	115
35	60	66	117
36	62	67	119
37	63	68	121
38	65	69	123
39	67	70	125
40	69	71	126
41	71	72	128
42	73	73	130
43	75	74	132
44	76	75	134
45	78	76	136
46	80	77	138
47	82	78	139
48	84	79	141
49	86	80	143