

STATEMENT OF BASIS

To: Reviewers
Through: Lori Bocchino, Operating Permit Program Manager
From: Rita Piroutek, Air Quality Engineer
Subject: Draft Chapter 6, Section 3 Operating Permit 3-2-125-1
 Simplot Phosphates LLC, Rock Springs Fertilizer Complex
Date: May 21, 2014 *Addendum July 21, 2014*

Introduction

Attached for your review is the draft modified Wyoming Air Quality Standards and Regulations (WAQSR) Chapter 6, Section 3 operating permit 3-2-125-1 for the Simplot Phosphates LLC, Rock Springs Fertilizer Complex. Permit 3-2-125 was issued August 17, 2011. The operating permit is being modified to incorporate new requirements which have become applicable to the Rock Springs Fertilizer Complex since the issuance of permit 3-1-125.

In 2012, the Environmental Protection Agency promulgated revised National Emission Standards for Hazardous Air Pollutants (NESHAPs) for several source categories, including Subpart AA for Phosphoric Acid Manufacturing Plants, Subpart BB for Phosphate Fertilizer Production Plants, Subpart ZZZZ for Internal Combustion Engines, and Subpart DDDDD for Industrial, Commercial, and Institutional Boilers and Process Heaters. WAQSR Chapter 6, Section 3(d)(vii) requires the Division of Air Quality to reopen the operating permit if additional requirements under the Act become applicable to a major source with a remaining permit term of 3 or more years. On November 19, 2012, Simplot Phosphates LLC was notified that the Division intended to reopen operating permit 3-2-125 to revise applicable requirements from 40 CFR 63, Subparts AA, BB, ZZZZ, and DDDDD. Upon review of the changes made to Subparts AA and BB, no revisions are necessary in the operating permit at this time for conditions related to those subparts.

Since the issuance of operating permit 3-2-125, the following permit and waivers were issued for the Rock Springs Fertilizer Complex:

Waiver AP-12908 was issued on March 8, 2012 to allow the replacement of the superheater within the auxiliary boiler (unit 8a). Applicable requirements for the auxiliary boiler (unit 8a) include an annual NO_x emission level restriction, monitoring, recordkeeping and reporting for a period of five years. Upon completion of the five year monitoring period, the emission levels and monitoring requirements set in this waiver will expire.

Permit MD-12795 was issued on March 20, 2012 to allow the installation of a third P₂O₅/gypsum filter table and new vent scrubber to collect fumes from this filter table as well as from other equipment, the replacement/rebuild of one of the two existing filter tables with a new unit, a new phosphate rock storage tank, new phosphoric acid clarifier and storage tank, new vacuum system which includes a pre-condenser vessel, a barometric condenser, a vacuum pump, and a new filter feed tank, which is necessary to achieve a production of 440,000 tons per year of P₂O₅ at the facility. The equipment listed in this permit has commenced construction. Applicable requirements include annual emission level restrictions, monitoring, recordkeeping, and reporting requirements for actual NO_x, CO, VOC, H₂SO₄, fluorides, and PM_{2.5} emissions for a period of five years from the following sources: P₂O₅ Plants (units

1a/1a'/1b), Lurgi Sulfuric Acid Plant (unit 9a), MEC Sulfuric Acid Plant (unit 9b), Ammonium Phosphate Plant (unit 10a), Ammonium Phosphate Loadout (unit 11), Ammonium Phosphate Baghouse (unit 12), and Gypsum Tailings Pond (unit 14). The permit also required the removal of the Phosphoric Acid Cooling Tower (unit 3a). This unit was removed from the facility in May 2013. Upon completion of the five year monitoring period, the emission levels and monitoring requirements set in permit MD-12795 will expire. This permit superseded permits MD-8686 and MD-8686A, as well as the P₂O₅ production limit from permit MD-384A.

A Division letter dated October 17, 2012 was issued to acknowledge the replacement of the Interpass Absorption Tower within the Monsanto sulfuric acid plant. A Division letter dated February 20, 2013 acknowledged the replacement of the intermediate absorption tower acid distribution system within the Lurgi sulfuric acid plant. These two letters do not have any applicable requirements and do not affect the operating permit.

The operating permit revisions include the following:

- Table of Contents is updated for repagination as appropriate; Appendix A is reserved due to the removal of the Phosphoric Acid Cooling Tower (unit 3a); Appendices B and D through L are reserved because the Division no longer includes the text of federal standards in Title V permits.
- The General Information page is updated to reflect a change in plant manager; the responsible official name has been removed as the Division no longer includes this in the text of operating permits.
- The Source Emission Points Table is revised to reflect the current equipment at the facility and some source descriptions for clarity, as well as update permit references.
- The Total Facility Estimated Emissions Table is revised to reflect emissions from the current equipment.
- All references to permits MD-8686 and MD-8686A are updated to permit MD-12795 throughout the permit.
- Condition F3 is revised to reflect a change in WAQSR Chapter 3, Section 2 regulations.
- Conditions F4, F16, F26, and F34 are revised to reflect the removal of the P₂O₅ production limit.
- Conditions F4, F15, F16, F26, F40, and P63-AA1 are updated to reflect the removal of the Phosphoric Acid Cooling Tower (unit 3a). Additionally, condition F36 is reserved and the summary for this unit is removed.
- The deadline for required testing is removed from condition F22, as it was completed.
- Condition F32 is updated to reflect a change in WAQSR Chapter 14.
- Condition F40 is updated to reflect the requirements of permits MD-12795 and waiver AP-12908. The reactor and FSA projects, previously authorized under MD-8686 and MD-8686A, are now referred to as the 440K reliability project. The auxiliary boiler project was added for the auxiliary boiler (unit 8a) to Table III. The H₂SO₄ and Fluorides emission levels for the 440K reliability project were revised in Table IV and the PM_{2.5} emission level is added. NO_x emission levels for the auxiliary boiler (unit 8a) are also added to Table IV.

- Condition F41 is updated to refer to the 440K reliability project, the monitoring for the auxiliary boiler project is added, and a typo is corrected in paragraph (a)(vii).
- Condition F42 is revised for the notification requirement of the 440K reliability project. The notification requirement for the boiler project is reserved, as the notification has been submitted.
- Condition F43 is updated to include the recordkeeping requirement for the annual NO_x emissions from the auxiliary boiler (unit 8a).
- Condition F44 is updated to refer to the 440K reliability project, and recordkeeping for the auxiliary boiler project is added.
- Reference to the Government Publishing Office's website to obtain copies of federal regulations is now given with permit conditions related to applicable NSPS and NESHAP standards, rather than referencing an attachment to the permit.
- Conditions referencing 40 CFR 60 Subparts IIII and JJJJ, 40 CFR 61 Subpart R, and 40 CFR 63 Subparts ZZZZ and DDDDD are updated to include wording used in operating permits currently issued by the Division.
- Reference to the State of Wyoming's website to obtain copies of state regulations is now given with permit conditions related to Compliance Assurance Monitoring, rather than referencing an attachment to the permit.
- Condition C1 is revised to remove references to the P₂O₅ production limit and the Phosphoric Acid Cooling Tower, and update the compliance certification requirements for 40 CFR 60 Subparts IIII and JJJJ, 40 CFR 61 Subpart R, and 40 CFR 63 Subparts ZZZZ and DDDDD, and re-numeration of sub-conditions as appropriate.
- The State Only Permit Conditions table is updated to reflect current ambient standards and wording.
- The Summary Tables are updated to reflect all the above changes, and revised to be consistent with other operating permits currently being issued by the Division.
- The Abbreviations list is revised to include definitions consistent with other operating permits currently being issued by the Division.

Addendum (July 21, 2014)

Permit MD-14824 was issued on July 8, 2014 for the installation of an anhydrous ammonia plant at the Rock Springs Fertilizer Complex. On July 21, 2014, construction had not yet commenced and the new permit is not activated. Therefore, no requirements from MD-14824 are included in this modified operating permit. Per WAQSR Ch 6, Sec 3(c)(i), the permittee shall apply to modify the operating permit within 12 months after commencing operation of the equipment authorized under MD-14824.

