

<p>IN THE MATTER OF COMPLIANCE BY Agrium U.S., Inc.</p> <p>WITH SECTION 70.94.161 RCW, Operating Permits for Air Contaminant Sources, and the applicable rules and regulations of the Benton Clean Air Agency (BCAA)</p>	<p>AIR OPERATING PERMIT No. 05-0002</p>
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<p>TO:</p> <p style="padding-left: 40px;">Agrium U.S., Inc. 227515 E. Bowles Road Kennewick, WA 99336</p>	<p>Issue Date:</p> <p>Effective Date: July 28, 2014</p> <p>Expiration Date: July 28, 2019</p>
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Responsible Official: Jon Berg, Plant Manager, Phone: (509)586-5430

Technical Contact: Thomas Klein, Environmental Supervisor, Phone: (509)586-5488

Legal Authority: This Air Operating Permit is issued under the authority and the provisions of the Federal Clean Air Act (FCAA, 42 U.S.C. 7401, *et seq.*), the Washington Clean Air Act, Chapter 70.94 Revised Code of Washington (RCW), the Operating Permit Regulation, Chapter 173-401 Washington Administrative Code (WAC), and the Benton Clean Air Agency under 40 CFR 52.21

Facility Location: The facility is located at 227515 E. Bowles Road, Kennewick, WA, Benton County.

Facility Description: Nitrogenous Fertilizer

Primary SIC Code: 2873
AIRS AFS 05-0002

Hereinafter, Agrium US, Inc. is referred to as the permittee. The permittee is required to comply with the provisions contained within this permit.

Robin Priddy, P. E.
Benton Clean Air Agency

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ABBREVIATIONS AND ACRONYMS

AN.....	Ammonium Nitrate
AOP	Air Operating Permit
BCAA.....	Benton Clean Air Agency
BFWWCAPCA	Benton Franklin Walla Walla Counties Air Pollution Control Authority (reformed as the BCAA in 1995)
CAA.....	Clean Air Act
CAN-17	Calcium Ammonium Nitrate
CEM.....	Continuous Emission Monitor
CFC	Chlorofluorocarbons
CFR	Code of Federal Regulations
CO.....	Carbon Monoxide
CO ₂	Carbon Dioxide
CPMS.....	Continuous Parametric Monitoring System
DCS.....	Distributive Control System
Ecology.....	Washington State Department of Ecology
EPA	Environmental Protection Agency
F.....	Federally Enforceable
FCAA.....	Federal Clean Air Act
GAN	Granulated Ammonium Nitrate
HAP.....	Hazardous Air Pollutant
IEU.....	Insignificant Emission Unit
grain/dscf	Grain per dry standard cubic foot (68°F, 29.92 inches Hg); unit of measure
g/dscm	Gram per dry standard cubic meter; unit of measure
MACT.....	Maximum Achievable Control Technology
MCC.....	Mississippi Chemical Company
MMBTU	Million British Thermal Unit (10 ⁶ BTU = 1,055 Joules); unit of measure
MVAC	Motor Vehicle Air Conditioner
NH ₃	Ammonia
NO ₂	Nitrogen Dioxide
NOC	Notice of Construction
NO _x	Nitrogen Oxides
NSPS	New Source Performance Standard
O&M.....	Operations and Maintenance Requirements
OA	Order of Approval
PM.....	Particulate Matter
PM ₁₀	Particulate Matter, less than 10 microns diameter
PM _{2.5}	Particulate Matter, less than 2.5 microns diameter
ppm	Parts per million; unit of measure
RACT.....	Reasonably Available Control Technology
RCW.....	Revised Code of Washington
S.....	State Only Enforceable
SCR	Selective Catalytic Reduction
SIP.....	State Implementation Plan
SO ₂	Sulfur Dioxide
TPY	Tons per Year; unit
TSP.....	Total Suspended Solids
UAN-32.....	Urea Ammonium Nitrate
VOC	Volatile Organic Compound
WAC	Washington Administrative Code

1. STANDARD TERMS AND CONDITIONS

All information required for submittal throughout this permit, is to be submitted to BCAA, EPA Region 10, or both as specified by the Applicable Requirement, at the following addresses:

For BCAA:

Director
Benton Clean Air Agency
526 South Clodfelter Road
Kennewick, WA, WA 99336

For EPA:

EPA Region 10 Administrator
Air Permits MS: OAQ-108
1200 Sixth Avenue
Seattle, Washington 98101

1.1. Duty to comply

The permittee must comply with all conditions of this WAC 173-401 permit. Any permit noncompliance constitutes a violation of chapter 70.94 RCW, and for federally enforceable provisions, a violation of the FCAA. Such violations are grounds for enforcement action; for permit termination, revocation and re-issuance, or modification, or for denial of a permit renewal application. [WAC 173-401-620(2)(a), 70.94 RCW]

1.2. Need to halt or reduce activity not a defense

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. [WAC 173-401-620(2)(b)]

1.3. Permit Actions

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 re-issuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [WAC 173-401-620(2)(c)]

1.4. Property Rights

This permit does not convey an property rights of any sort, or any exclusive privilege [WAC 173-401-620(2)(d)]

1.5. Duty to provide information

The permittee shall furnish to the BCAA, within a reasonable time, any information that BCAA 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 BCAA copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the administrator along with a claim of confidentiality. Permitting authorities shall maintain confidentiality of such information according to RCW 70.94.205. [WAC 173-401-620(2)(e); RCW 70.94.205]

1.6. Permit Fees

The permittee shall pay fees as a condition of this permit according to the BCAA fee schedule. Failure to pay fees in a timely fashion shall subject the Permittee to civil and criminal penalties as prescribed in chapter 70.94 RCS. [BCAA Regulation 1, Section 10.09; RCS 70.94.162(1); WAC 173-401-620(2)(f); WAC 173-401-930(3)]

1.7. Emissions Trading

No permit revision shall be required, under any approved economic incentive, marketable permits, emission trading, another similar programs of processes for changes that are provided for in this permit. [WAC 173-401-620(2)(g)].

1.8. Severability

If any provision of this permit is held to be invalid, all unaffected provisions of the permit shall remain in effect and be enforceable. [WAC 173-401-620(2)(h); RCW 70.94.905]

1.9. Permit Appeals

This permit or any conditions in it may be appealed only by filing an appeal with the Pollution Control Hearings Board at PO Box 40903, Olympia, WA 98504 and concurrently serving it on the BCAA within thirty (30) days of receipt pursuant to RCW 43.21B.310. This provision for appeal in this section is separate from and additional to any federal rights to petition and review under § 505(b) of the FCAA.

Pollution Control Hearings Board	and	Benton Clean Air Agency
P.O. Box 40903		526 South Clodfelter Road
Olympia, WA 98504		Kennewick, WA 99336

[WAC 173-401-620(2)(i); RCW 70.94.221]

1.10. Permit Continuation

This permit and all terms and conditions contained therein, including any permit shield provided under WAC 173-401-640, shall not expire until the renewal permit has been issued or denied if a timely and complete application has been submitted. An application shield granted pursuant to WAC 173-401-705(2) shall remain in effect until the renewal permit has been issued or denied if a timely and complete application has been submitted. [WAC 173-401-620(2)(j)]

1.11. Permit Renewal and Expiration

This permit is issued for a fixed term of five (5) years. The permittee may continue to operate this source with all terms and conditions remaining in effect after the permit itself expires provided a timely and complete permit application has been submitted. BCAA shall send a permit application to the permittee at least six (6) months before the completed application for renewal is due. The permittee shall return the completed renewal application to BCAA no less than six months prior to the permit expiration date. BCAA, at their discretion, may extend the due date for receiving the completed application but in no event shall the due date be earlier than eighteen months prior to the expiration date. The

application for renewal shall include the current permit number, the appropriate renewal fee, description of permit revisions and off-permit changes that occurred during the current permit term, any Applicable Requirements that were promulgated and not incorporated into the permit during the permit term and shall provide a compliance schedule. The application shall be sent to Benton Clean Air Agency, 526 South Clodfelter Road, Kennewick, WA 99336.

[WAC 173-401-610; WAC 173-401-710(1)]

1.12. Record Keeping

Permittee shall keep records of required monitoring information that includes the following:

1.12.1. Monitoring Records [WAC 173-401-615(2)(a)]

1.12.1.1. The date, place (as defined in the permit), and time of sampling or measurements;

1.12.1.2. The date(s) analyses were performed;

1.12.1.3. The company or entity that performed the analyses;

1.12.1.4. The analytical techniques or methods used;

1.12.1.5. The results of such analyses; and

1.12.1.6. The operating conditions as existing at the time of sampling or measurement.

1.12.2. Permittee shall keep records describing changes made at the source that result in emissions of a regulated air pollutant subject to an Applicable Requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes. [WAC 173-401-615(2)(b)]

1.12.3. Permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records or electronic database records from continuous monitoring instrumentation, and copies of all reports required by this permit. [WAC 173-401-615(2)(c)]

1.12.4. The permittee shall maintain a contemporaneous record of all permit deviations. [WAC 173-401-615(3)(b)]

1.13. Reporting

The permit shall incorporate all applicable reporting requirements and require the following: [WAC 173-401-615(3)]

1.13.1. General requirements [WAC 173-401-615(3)(a)]

1.13.1.1. Reports of any required monitoring at least once every six (6) months.

1.13.1.2. All instances of deviations from requirements must be clearly identified.

1.13.1.3. All required reports must be certified by a responsible official consistent with WAC 173-401-520.

1.13.1.4. The permittee shall promptly report deviations from permit requirements including those attributable to upset conditions. Prompt reporting of deviations from permit requirements is defined as follows: [WAC 173-401-615(3)(b)]

1.13.1.4.1. The permitting authority shall define “prompt” as thirty (30) days after the end of the month during which the deviation occurred. Specific time allowances for reports, which are not specified in this section, will appear in the permit under the “reporting” subsection of specific Applicable Requirements for specific emission unit or processes.

1.13.1.4.2. Report deviations that represent a potential threat to human health or safety as soon as possible, but in no case later than twelve (12) hours after discovery.

1.13.1.4.3. Other deviations shall be reported no later than thirty (30) days after the end of the month during which the deviation occurred.

1.13.1.4.4. The permittee shall maintain a contemporaneous record of all deviations.

1.13.1.4.5. Deviations from permit requirements and upset conditions shall be reported by telephone, fax or e-mail. The permittee shall investigate the event and submit a written report promptly, and in no case later than fifteen (15) working days after the deviation was discovered. A written report shall include the probable cause, corrective action taken, and the preventative measures to be taken to minimize or eliminate the chance of reoccurrence.

1.13.2. Reporting of excess emissions. See also Section 1.22 Excess Emissions.

1.13.2.1. An emergency resulting in excess emissions as defined in WAC 173-401-645(1) shall be reported within two (2) working days. [WAC 173-401-645(3)(d)]

1.13.2.2. Scheduled startups of nitric acid plant 7 shall be reported by telephone, fax, or e-mail at the time of its occurrence. Unscheduled shutdowns shall be reported as soon as possible. [WAC 173-400-107(3); BCAA RO No. 199901, 16]

1.13.2.3. Scheduled startups of nitric acid plant 9 shall be reported by telephone, fax, or e-mail at the time of its occurrence. Unscheduled shutdowns shall be reported as soon as possible. [WAC 173-400-107(3)]

1.13.2.4. Report excess emissions due to startup and shutdown of processes other than those listed above within thirty (30) days after the end of the month during which the event occurred. [WAC 173-400-107(4); WAC 173-400-107(3)].

1.13.2.5. Report excess emissions resulting from scheduled maintenance within thirty (30) days after the end of the month during which the event occurred. [WAC 173-400-107(5); WAC 173-400-107(3)]

1.13.3. Continuous emission monitoring (CEM) reports for compliance with NO₂ emission limitations shall be reported semi-annually. [40 CFR 60.7(7)(c)]

1.14. Inspection and entry

Upon presentation of credentials and other documents as may be required by law, the permittee shall allow BCAA or an authorized representative to perform the following [WAC 173-401-630(2)]:

- 1.14.1. Enter upon the permittee's premises where a WAC 173-401 source is located or emissions-related activity is conducted, or where records must be kept under the conditions of this permit [WAC 173-401-630(2)(a)];
- 1.14.2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit [WAC 173-401-630(2)(b)];
- 1.14.3. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit [WAC 173-401-630(2)(c)]; and
- 1.14.4. Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or other Applicable Requirements. [WAC 173-400-105(4) and WAC 173-401-630(2)(d)]
 - 1.14.4.1. BCAA may require the permittee to conduct stack and/or ambient air monitoring and report the results to BCAA. [WAC 173-400-105(2)]
 - 1.14.4.2. BCAA may conduct or require that a test be conducted using approved EPA methods from 40 CFR 60 Appendix A or approved procedures contained in "Source Test Manual - Procedures for Compliance Testing," State of Washington, Department of Ecology. The permittee may be required to provide platform and sampling ports. BCAA shall be allowed to obtain a sample from any emissions unit. The permittee shall be given the opportunity to observe the sampling and to obtain a sample at the same time. [WAC 173-400-105(4)]
- 1.14.5. BCAA may conduct source tests and require access to records, books, files, and other information specific to the control, recovery, or release of pollutants regulated under 40 CFR Part 61. [WAC 173-400-075(2)]
- 1.14.6. No person shall obstruct, hamper, or interfere with any such authorized representative while in the process of carrying out his official duties. [RCW 70.94.200]

1.15. Reopening for cause: Permits shall be reopened and revised under any of the following circumstances:

- 1.15.1. Additional Applicable Requirements become applicable to a major WAC 173-401 source with a remaining permit term of three or more years. Such a reopening shall be completed no later than 18 months after promulgation of the Applicable Requirements. No such 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 pursuant to WAC 173-401-620(2)(j); [WAC 173-401-730(1)(a)]
- 1.15.2. Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the administrator, excess emissions offset plans shall be deemed to be incorporated into the permit; [WAC 173-401-730(1)(b)]
- 1.15.3. BCAA or the administrator 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; or [WAC 173-401-730(1)(c)]
- 1.15.4. The administrator or BCAA determines that the permit must be revised or revoked to

assure compliance with the Applicable Requirements. [WAC 173-401-730(1)(d)]

- 1.15.5. Proceedings to reopen and issue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable. [WAC 173-401-730(2)]
- 1.15.6. Reopening under this section shall not be initiated before a notice of intent is provided to the WAC 173-401 source by BCAA at least 30 days in advance of the date that the permit is to be reopened. BCAA may provide a shorter time period in the case of an emergency. [WAC 173-401-730(3)]

1.16. Submittals

Reports, test data, monitoring data, notifications and requests for renewal shall be submitted to BCAA at 526 South Clodfelter Road, Kennewick, WA 99336.

1.17. Permit Revision

An activity or emissions unit that qualifies as insignificant based on WAC 173-401-530(1)(a) shall not exceed the emissions threshold specified in WAC 173-401-530(4), until the permit is modified pursuant to WAC 173-401-725. [WAC 173-401-530(6)]

1.18. Reasonable and Available Control Technology

Emission standards and other requirements contained in rules or regulatory orders in effect at the time of operating permit issuance or renewal shall be considered Reasonable and Available Control Technology (RACT) for purpose of permit issuance or renewal. This does not preclude considered RACT determinations under Section 8, Chapter 252, Laws of 1993, which shall be incorporated into an operating permit. [WAC 173-401-605(3) and WAC 173-401-730]

1.19. Enforceability

All terms and conditions of the permit are enforceable by the EPA and citizens unless specifically designated as state enforceable. [WAC 173-401-625]

1.20. Permit Shield

Compliance with the conditions of this permit shall be deemed compliance with any Applicable Requirements as of the date of permit issuance, provided that Applicable Requirements are included and specifically identified in this permit. Permit shield is subject to all exclusions listed in 1.21 below. No permit shield is implied or explicit for past new source review, PSD, or for any Applicable Requirement not specifically identified in the permit. [WAC 173-401-640(1)]

1.21. Exclusions: Nothing in this permit shall alter or affect the following:

- 1.21.1. The provisions of section 303 of the FCAA (emergency orders), including the authority of the administrator under that section; [WAC 173-401-640(4)(a)]
- 1.21.2. The liability of an owner or operator of a source for any violation of Applicable Requirements prior to or at the time of permit issuance; [WAC 173-401-640(4)(b)]
- 1.21.3. The Applicable Requirements of the acid rain program, consistent with section 408(a) of the FCAA; [WAC 173-401-640(4)(c)]

- 1.21.4. The ability of EPA to obtain information from a source pursuant to section 114 of the FCAA; or [WAC 173-401-640(4)(d)]
- 1.21.5. The ability of BCAA to establish or revise requirements for the use of RACT as provided in Chapter 252, Laws of 1993. [WAC 173-401-640(4)(e)]

1.22. Excess emissions

1.22.1. Excess emissions due to emergency.

The permittee may seek to establish that noncompliance with a technology-based emission limitation under this permit was due to an emergency. To do so, the permittee shall demonstrate the affirmative defense of emergency through operating logs, or other relevant evidence that: [WAC 173-401-645(3)]

- 1.22.1.1. An emergency occurred and that the permittee can identify the cause(s) of the emergency; [WAC 173-401-645(3)(a)]
- 1.22.1.2. The permitted source was at the time being properly operated; [WAC 173-401-645(3)(b)]
- 1.22.1.3. 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; and [WAC 173-401-645(3)(c)]
- 1.22.1.4. The permittee submitted notice of the emergency to BCAA within two (2) working days of the time when emission limitations were exceeded due to the emergency or shorter periods of time specified in an Applicable Requirement. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. [WAC 173-401-645(3)(d)]

1.22.2. Unavoidable Excess Emissions

The permittee shall have the burden of proving to BCAA that excess emissions were unavoidable. Excess emissions determined to be unavoidable under procedures and criteria in WAC 173-400-107 shall be excused and not subject to penalty. [WAC 173-400-107(1) and (2)]

- 1.22.2.1. Excess emission due to startup or shutdown shall be considered unavoidable, if the source reports as required by BCAA Regulation 1 and WAC 173-400-107(3). This reporting adequately demonstrates that the excess emissions could not have been prevented through careful planning and design and if a bypass of control equipment occurs, that such bypass is necessary to prevent loss of life, personal injury, or severe property damage. [WAC 173-400-107(4)]
- 1.22.2.2. Excess emission due to scheduled maintenance shall be considered unavoidable if the source reports as required under WAC 173-400-107(3) and adequately demonstrates that the excess emissions could not have been avoided through reasonable design and better scheduling for maintenance or through better operation and maintenance practices. [WAC 173-401-107(5)]
- 1.22.2.3. Excess emission due to upsets shall be considered unavoidable provided the source reports as required under WAC 173-400-107(3) and adequately demonstrates that: [WAC 173-400-107(6)]

- 1.22.2.3.1. The event was not caused by poor design, operation, maintenance, or any other reasonably preventable condition; [WAC 173-400-107(6)(a)]
- 1.22.2.3.2. The event was not of a recurring pattern indicative of inadequate design, operation, or maintenance; and [WAC 173-400-107(6)(b)]
- 1.22.2.3.3. The operator took immediate corrective action in a manner consistent with good air pollution control practice to minimize emissions during the event, taking into account the total emissions impact of the corrective action, including slowing or shutting down the emission unit as necessary to minimize emissions, when the operator knew or should have known that an emission standard or permit condition was being exceeded. [WAC 173-400-107(6)(c)]

1.23. Transfer of ownership or operation

A change in ownership or operational control of this source 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 BCAA. [WAC 173-401-720(1)(d)]

1.24. Changes not requiring permit revisions: Permittee is authorized to make the changes described in this section without a permit revision, providing the following conditions are met:

- 1.24.1. The proposed changes are not Title I modifications [WAC 173-401-722(1)(a)(i)];
- 1.24.2. The proposed changes do not result in emissions which exceed those allowable under the permit, whether expressed as a rate of emissions, or in total emissions [WAC 173-401-722(1)(a)(ii)];
- 1.24.3. The proposed changes do not alter permit terms that are necessary to enforce limitations on emissions from units covered by the permit [WAC 173-401-722(1)(a)(iii)]; and
- 1.24.4. The source provides the administrator and BCAA with written notification at least seven days prior to making the proposed changes except that written notification of a change made in response to an emergency shall be provided as soon as possible after the event [WAC 173-401-722(1)(a)(iv)].
 - 1.24.4.1. Notification shall be submitted to BCAA.
 - 1.24.4.2. The source and BCAA shall attach each notice to their copy of the relevant permit [WAC 173-401-722(1)(b)].
- 1.24.5. Pursuant to conditions in 1.24.1 through 1.24.4, the source is authorized to make WAC 173-401-502(b)(10) changes as defined in WAC 173-401-200(28) without a permit revision. [WAC 173-401-722(2)]
 - 1.24.5.1. For each such change, the written notification required under 1.24.4 shall include a brief description of the change within the permitted source, 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. [WAC 173-401-722(2)(a)]

- 1.24.5.2. The permit shield authorized under WAC 173-401-640 shall not apply to any change made pursuant to this paragraph. [WAC 173-401-722(2)(b)]
- 1.24.6. Pursuant to the conditions in 1.24.1 through 1.24.4, a WAC 173-401 source is authorized to trade increases and decreases in emissions in the permitted source, where the Washington SIP provides for such emissions trades without requiring a permit revision. This provision is available in those cases where the permit does not already provide for such emissions trading. [WAC 173-401-722(3)]
- 1.24.6.1. Written notification required under 1.24.4 shall include such information as may be required by the provision in the Washington SIP authorizing the emissions trade, including at a minimum, when the proposed change will occur, a description of each such change, any change in emissions, the permit requirements with which the source will comply using the emissions trading provisions of the Washington SIP, and the pollutants emitted subject to the emissions trade. The notice shall also refer to the provisions with which the source will comply in the applicable implementation plan and that provide for the emissions trade. [WAC 173-401-722(3)(a)]
- 1.24.6.2. The permit shield described in WAC 173-401-640 shall not extend to any change made under this paragraph. Compliance with the permit requirements that the source will meet using the emissions trade shall be determined according to requirements of the applicable SIP authorizing the emissions trade. [WAC 173-401-722(3)(b)]
- 1.24.7. Upon the request of the permit applicant, BCAA shall issue permits that contain terms and conditions, including all terms required under WAC 173-401-600 through 173-401-630 to determine compliance, allowing for the trading of emissions increases and decreases in the WAC 173-401 source solely for the purpose of complying with a federally enforceable emissions cap that is established in the permit independent of otherwise Applicable Requirements. The permit applicant shall include in its application proposed replicable procedures and permit terms that ensure the emissions trades are quantifiable and enforceable. The emissions trading provisions shall not be applied to any emissions units for which emissions are not quantifiable or for which there are no replicable procedures to enforce the emissions trades. The permit shall also require compliance with all Applicable Requirements. [WAC 173-401-722(4)]
- 1.24.7.1. Under this paragraph, the written notification required under paragraph 1.24.4 shall state when the change will occur and shall describe the changes in emissions that will result and how these increases and decreases in emissions will comply with the terms and conditions of the permit. [WAC 173-401-722(4)(a)]
- 1.24.7.2. The permit shield described in WAC 173-401-640 shall extend to terms and conditions that allow such increases and decreases in emissions. [WAC 173-401-722(4)(b)]
- 1.24.8. A source making a change under this section shall comply with applicable pre-construction review requirements established pursuant to RCW 70.94.152. [WAC 173-401-722(5)]

1.25. Off-permit changes

The source shall be allowed to make changes not specifically addressed or prohibited by the permit terms and conditions without requiring a permit revision, provided that the proposed changes do not weaken the enforceability of the existing permit conditions. Any change that is a Title I modification or is a change subject to the acid rain requirements under Title IV of the FCAA must be submitted as a permit revision. [WAC 173-401-724(1)]

- 1.25.1. Each such change shall meet all Applicable Requirements and shall not violate any existing permit term or condition. [WAC 173-401-724(2)]
- 1.25.2. Sources must provide written notice to BCAA of each change. Written notice shall describe each change, including the date, any change in emissions, pollutants emitted, and any Applicable Requirement that would apply as a result of the change. See also Section 1.13 (page 3). [WAC 173-401-724(3)]
- 1.25.3. The change shall not qualify for the permit shield under WAC 173-401-640. [WAC 173-401-724(4)]
- 1.25.4. The permittee shall keep a record describing changes made at the source resulting in emissions of a regulated air pollutant subject to an Applicable Requirement, but not otherwise regulated under the permit. A record of the emissions resulting from those changes shall also be maintained. [WAC 173-401-724(5)]
- 1.25.5. A source making a change under this section shall comply with applicable pre-construction review requirements by RCW 70.94.152. [WAC 173-401-724(6)]

1.26. Demolition and renovation (asbestos)

Prior to, during, and after conducting any activity to which 40 CFR 61, Subpart M, National Emission Standard for Asbestos, applies, the permittee shall comply with the requirements of that rule. Such activities include demolition, renovation, asbestos stripping or removal, installing or reinstalling insulation, manufacturing or fabricating certain items, spraying of certain materials, constructing roadways of certain materials, or disposal of asbestos or asbestos containing material. [40 CFR 61, Subpart M; WAC 173-400-075(1), BCAA Regulation 1, Articles 8 and 10]

1.27. New source review

The permittee shall not construct new sources or make modifications required to be reviewed under the following before the permittee obtains written final approval from BCAA according to those regulations, pays the appropriate fees required by BCAA Regulation 1, WAC 173-400-116, WAC 173-400-171, and/or WAC 173-460-130. [WAC 173-400-110, WAC 173-400-113, WAC 173-400-116, WAC 173-400-141, WAC 173-400-171; WAC 173-460; RCW 70.94.152, RCW 70.94.153]:

- 1.27.1. WAC 173-400-110, New Source Review;
- 1.27.2. WAC 173-400-112, Requirements for New Sources in Nonattainment Areas;
- 1.27.3. WAC 173-400-113, Requirements for New Sources in Attainment or Unclassifiable Areas;

- 1.27.4. WAC 173-400-141, Prevention of Significant Deterioration (PSD); or
- 1.27.5. WAC 173-460-040 New Source Review

1.28. Emission inventory

Permittee shall submit an inventory of emissions from the source for each calendar year. The inventory shall include stack and fugitive emissions of TSP, PM₁₀, SO₂, CO, NO_x, lead, and VOCs. The inventory shall be sent to BCAA no later than April 15 for the previous year. The source shall maintain for five (5) years records of information necessary to substantiate any reported emissions, consistent with the averaging times for the applicable standards. [WAC 173-400-105(1)]

1.29. Federal CFC requirements (Title VI)

The permittee shall comply with the following standards for recycling and emissions reductions pursuant to 40 CFR 82, Subpart F, except as provided for MVACs in Subpart B: [40 CFR 82; RCW 70.94.970; RCW 70.94.980]

- 1.29.1. Persons conducting maintenance, service, repair, or disposing must follow the prohibitions pursuant to 40 CFR 82.154.
- 1.29.2. Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- 1.29.3. Equipment used during the maintenance, service, repair or disposal must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- 1.29.4. Persons performing maintenance, service and repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.
- 1.29.5. Persons conducting maintenance, service, repair, or disposing must certify to the Administrator that such person has acquired certified recovery or recycling equipment pursuant to 40 CFR 82.162.
- 1.29.6. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to 40 CFR 82.166.
- 1.29.7. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR 82.156.
- 1.29.8. Owners/operators of appliances normally containing 50 or more pounds of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166 must comply.
- 1.29.9. If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR 82, Subpart A - Production and Consumption Controls.
- 1.29.10. If the permittee performs a service on motor (fleet) vehicles and when this service involves ozone depleting substance refrigerant in the MVAC, the permittee is subject to all Applicable Requirements as specified in 40 CFR 82, Subpart B - Servicing of Motor Vehicle Air Conditioners.
- 1.29.11. The permittee shall be allowed to switch from any ozone depleting substance to any alternative that is listed in the Significant New Alternative Program promulgated pursuant to 40 CFR 82, Subpart G - Significant New Alternative Policy Program.

1.30. Chemical Accident Prevention Program: According to 40 CFR Part 68, the permittee shall comply with the following requirement:

1.30.1. The facility is subject to part 68. The permittee shall certify compliance with all requirements of 40 CFR part 68, including the registration and submission of the risk management plan (RMP) as part of the annual compliance certification.

[40 CFR 68.150 to 68.185 and 68-215(a)(ii)]

1.31. State Reporting of Emissions of Greenhouse Gases WAC 173-441

WAC 173-440 requires owners and operators of affected facilities to quantify and report emission of greenhouse gases from applicable source categories listed in WAC 173-441-120. This regulation applies to any facility located in Washington State with total greenhouse gas emissions of ten thousand metric tons CO₂e or more per calendar year. The permittee shall prepare and submit greenhouse gas reports to Ecology in according to the provisions of WAC 173-441-050 for each affected facility.

[WAC 173-441, 1/11/2011, BCAA RO 2011-0007 Condition 3.3.3]

1.32. Federal Mandatory Greenhouse Gas Reporting 40 CFR Part 98

The permittee shall comply with reporting requirements in 40 CFR 98.

1.33. Certification

Any application form, report, or compliance certification submitted pursuant to this permit shall contain certification by a responsible official of truth, accuracy, and completeness. Certification shall state the following, "based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete." [WAC 173-401-520]

2. OPERATIONAL FLEXIBILITY

2.1. Alternative operating scenarios

- 2.1.1. The permittee did not request or specify any alternative operating scenarios. [WAC 173-401-650]

3. COMPLIANCE PLAN

3.1. Current Requirements

The permittee shall continue to comply with requirements currently in effect. [WAC 173-401-510(2)(h)]

3.2. Applicable Requirements

The permittee shall meet Applicable Requirements on a timely basis that become effective during the permit term. [WAC 173-401-510(2)(h)]

3.3. Compliance Certification

- 3.3.1. The permittee shall submit to the BCAA a certification of compliance with permit terms and conditions at least once per year. BCAA may require that compliance certifications are submitted more frequently for those emission units not in compliance with the permit terms and conditions, or where more frequent certification is specified in the Applicable Requirement. [WAC 173-401-630(5)(a)]
- 3.3.2. The compliance certification shall include the following [WAC 173-401-630(5)(c)]:
- 3.3.2.1. The identification of each term or condition of the permit that is the basis of the certification;
 - 3.3.2.2. The compliance status;
 - 3.3.2.3. Whether compliance was continuous or intermittent; and
 - 3.3.2.4. The method used to determine the compliance status of the source, currently and over the reporting period consistent with WAC 173-401-615(3)(a).
- 3.3.3. The permittee need not certify compliance for insignificant emission units (IEUs). [WAC 173-401-530(2)(d)]
- 3.3.4. Compliance certification shall be submitted to the BCAA and EPA. [WAC 173-401-630(5)(d)]
- 3.3.5. For the purpose of submitting compliance certification or establishing whether or not a person has violated or is in violation of any standard in this part, nothing in this part shall preclude the use, including the exclusive use, of credible evidence or information, relevant to whether a source would have been in compliance with Applicable Requirements if the appropriate performance or compliance test or procedure had been performed. [40 CFR 60.11(g)]

4. APPLICABLE REQUIREMENTS

4.1. Summary

The following table shows each process and indicates whether facility-wide only, or facility-wide and additional Applicable Requirements apply to the process. Facility-wide Applicable Requirements are in Section 4. For the purposes of reporting compliance with the facility-wide requirements contained in Section 5, except for opacity requirements, certification for each requirement may be made on a facility-wide basis. Additional Applicable Requirements for Kennewick Area are in Section 5, for Finley area in Section 6, and Hedges Area in Section 7. IEUs are listed in Table 7 in the Statement of Basis and are excluded from Table 1 below.

Table 1: Facility-wide and Process Specific Applicable Requirement Summary

Process Number	Process Name	Emission Point Description	Applicable Requirements	
			Facility-wide ONLY	Facility-wide and Additional
KENNEWICK AREA				
2	Plant 9	Tailgas stack - normal operation Extended absorption and H ₂ O ₂ addition		X
2A	Plant 9	Tailgas stack - Shutdown		X
2B	Plant 9	Tailgas stack - Start-up		X
3	Plant 7	Tailgas stack		X
5	Plant 3 GAN Solution Granulation	Joy scrubber		X
5B	Plant 3 GAN	Rotocone Scrubber and Fugitive		X
6	Ammonium nitrate solution production (Plant 8 MCC neutralizer)	MCC Exhaust stack		X
7	Ammonium nitrate solution production (Plant 10 MCC neutralizer)	MCC exhaust stack		X
8	Ammonium nitrate granulation process (Plant 10)	Joy scrubber stack		X
8A	GAN fluid bed cooler (Plant 10)	Product cooler stack		X
11	Solid urea storage and handling	Baghouse		X
12	Urea loading	Baghouse		X
13	Boiler F-521 (CB-3)	Exhaust stack		X
15	Boiler F-513 (CB-2)	Exhaust stack		X
16	Boiler F-502 (Ames)	Exhaust stack		X
17	Nitric acid concentrator process	Scrubber stack	X	
19	UAN-32 solution production (Plant 8)	Mixer stack		X
19A	UAN-32 Urea transfer	Baghouse stack		X
20	UAN-32 solution production (Plant 11)	Mixer stack		X

Process Number	Process Name	Emission Point Description	Applicable Requirements	
			Facility-wide ONLY	Facility-wide and Additional
21	CAN-17 solution production (Plant 8)	Mixer stack		X
22	CAN-17 calcium carbonate transfer (Plant 8)	Baghouse stack		X
23	Anhydrous ammonia storage and transfer	Fugitive	X	
24	Emergency Flare	Flare Stack	X	
FINLEY AREA				
34	Boiler F-600-C	Exhaust stack		X
42	Utility flare	Flare stack		X
48	Anhydrous ammonia storage and transfer	Fugitive	X	
49	Aqua ammonia production	Fugitive	X	
HEDGES AREA				
60	Ammonia heater 2 (E-400)	Heater stack	X	
61	Ammonia heater 1 (E-204)	Heater stack	X	
62	Utility flare 1	Flare stack		X
63	Purge flare 2	Flare stack	X	
65	Anhydrous ammonia storage and transfer	Fugitive	X	

5. APPLICABLE REQUIREMENTS – FACILITY -WIDE

Until this permit expires, is modified or revoked, the permittee is authorized to operate air emission processes listed in Tables 1 to 4 in the Statement of Basis. A process is a collection of emission units, discharge points or activities grouped together for the purpose of permit organization.

Facility-wide (Process 1). All requirements apply facility-wide unless an alternative requirement or method is specifically stated for a particular emission unit or discharge point. Since monitoring, recordkeeping, and reporting has not specifically been required by BCAA for IEUs, per WAC 173-400-105(1), there are no air operating permit monitoring, recordkeeping, and reporting requirements for the IEUs under this facility-wide section, as allowed per WAC 173-401-530(2)(c).

5.1. Visible Emissions

Applicable Requirement 1 of 7: State (X)/Federal (X) WAC 173-400-040(2)

This visible emission condition applies to all processes except for the following:

- Process 2A: Plant 9 – Nitric Acid Manufacture - Tailgas Stack shutdown
- Process 2B: Plant 9 – Nitric Acid Manufacture - Tailgas Stack start-up
- Process 6A: Ammonium Nitrate Solution Storage (Plant 8) - Storage Vent Stack
- Process 9: GAN Storage and Handling – Fugitive
- Process 10: Granulating ammonium nitrate loading – Fugitive
- Process 18: AN 20% Solution Production - Tank/Vent
- Process 23: Anhydrous Ammonia Storage and Transfer – Fugitive
- Process 43: River Water Return Vents – Vents (Three)
- Process 45: Plant 1 Feedwater Deaerator – Vent
- Process 48: Anhydrous Ammonia Storage and Transfer – Fugitive
- Process 49: Aqua Ammonia Production – Fugitive
- Process 65: Anhydrous Ammonia Storage and Transfer – Fugitive

5.1.1. Description: Opacity shall not exceed 20%

5.1.2. Test Method: Test Method 1: Qualitative Assessment Test Method 2: 40 CFR 60 Appendix A Method 9 (if required)

5.1.3. Monitoring:

5.1.3.1. The following procedures shall constitute monitoring for purposes of compliance: [WAC 173-401-615(1)(b)]

5.1.3.2. A qualitative assessment of the visual emissions of each emission point, listed in the Applicable Requirement section above, shall be conducted weekly by plant personnel. Plant personnel may be certified, previously certified, or non-certified but thoroughly knowledgeable of the “Visible

Emissions Field Manual: Methods 9 and 22”¹. If any visible emission occurs that has the potential to exceed the applicable opacity standard, the permittee shall take the following action(s):

- 5.1.3.2.1. Action 1: Verify that the equipment and/or control device causing the emission problem is operating according to manufacturer’s specifications or other site-specific acceptable operating conditions. If the equipment or control device is not operating properly, the permittee shall take corrective action immediately to eliminate excess visible emissions.
- 5.1.3.2.2. Action 2: Conduct an opacity test per EPA Method 9 if the corrective action taken in Action 1 does not rectify the opacity problem within two (2) hours. Reporting of opacity as a process upset under Section 1.13 should only be required when “Action 2” corrective actions does not rectify a minor opacity problem within 2 hours.
- 5.1.3.2.3. Action 3: Conduct an opacity test per EPA Method 9 daily until corrective action successfully rectifies the opacity problem.

5.1.4. Record Keeping

- 5.1.4.1. The date and results of the qualitative assessments of visual emissions shall be recorded. [WAC 173-401-615(2)]
- 5.1.4.2. All required EPA Method 9 observations shall be recorded on a form similar to Figure 9-2, 40 CFR 60 Appendix A Method 9.
- 5.1.4.3. Maintain compliance documents for a period of five (5) years. [WAC 173-401-615(2)(c)]

5.1.5. Reporting

- 5.1.5.1. The date and results of the qualitative assessments shall be submitted to BCAA during the reporting period in which the assessments were performed. [WAC 173-401-615(3)(a)]
- 5.1.5.2. All required EPA Method 9 observations shall be submitted to BCAA during the reporting period in which the tests were performed. [WAC 173-401-615(3)(a)]
- 5.1.5.3. Specific to this Applicable Requirement the permittee shall report according to section 1.13. [WAC 173-401-615(3); WAC 173-401-645(3)(d); WAC 173-400-107(3); WAC 173-400-107(4); WAC 173-400-107(5)]

5.2. Fallout

Applicable Requirement 2 of 7: State (X)/Federal () WAC 173-400-040(3)

- 5.2.1. Description:** Particulate shall not be deposited beyond the source’s boundary in sufficient quantity to interfere unreasonably with the use and enjoyment of property.
- 5.2.2. Test Method:** No test method required, monitoring, record keeping and reporting only.

¹ Environmental Protection Agency. 1993. Visible Emissions Field Manual: EPA Method 9 and 22. Research Triangle Park, NC: Office of Air Quality Planning and Standards (EPA 340/1-92-004).

5.2.3. Monitoring: No action is necessary unless a complaint is received. If a complaint is received, the permittee shall initiate an investigation within four (4) hours after receiving the complaint to assess its validity. [WAC 173-401-615(1)]

5.2.4. Record Keeping

5.2.4.1. Permittee shall maintain a written record of all complaints received. Record keeping shall include corrective action taken in response to complaints. [WAC 173-401-615(2)]

5.2.4.2. Maintain compliance documents for a period of five (5) years. [WAC 173-401-615(2)(c)]

5.2.5. Reporting

5.2.5.1. Permittee shall notify BCAA within three (3) working days of receipt of any valid complaint.

5.2.5.2. As part of the 6-month monitoring report required by Condition 1.13 and as part of the annual compliance certification report required by Condition 3.3, the permittee shall indicate whether any complaints have been received during the specified reporting period. The corrective action taken in response to complaints shall also be included in these reports. [WAC 173-401-615(3)]

5.3. Fugitive Emissions

Applicable Requirement 3 of 7: State (X)/Federal (X) WAC 173-400-040(4)(a)

5.3.1. Description: Permittee shall use reasonable precautions to control fugitive emissions.

5.3.2. Test Method: No test method required, monitoring, record keeping and reporting only.

5.3.3. Monitoring: No action is necessary unless a complaint is received. If a complaint is received, the permittee shall initiate an investigation within four (4) hours after receiving the complaint to assess its validity. [WAC 173-401-615(1)]

5.3.4. Record Keeping:

5.3.4.1. Permittee shall maintain a written record of all complaints received. Record keeping shall include corrective action taken in response to complaints. [WAC 173-401-615(2)]

5.3.4.2. Maintain compliance documents for a period of five (5) years. [WAC 173-401-615(2)(c)]

5.3.5. Reporting

5.3.5.1. Permittee shall notify BCAA within three (3) working days of receipt of any valid complaint.

5.3.5.2. As part of the 6-month monitoring report required by Condition 1.13 and as part of the annual compliance certification report required by Condition 3.3, the

permittee shall indicate whether any complaints have been received during the specified reporting period. The corrective action taken in response to complaints shall also be included in these reports. [WAC 173-401-615(3)]

5.4. Odors

Applicable Requirement 4 of 7: State (X)/Federal () WAC 173-400-040(5)

- 5.4.1. Description:** Odors, which may unreasonably interfere with use and enjoyment of property, are prohibited unless recognized good practice and procedures are employed to reduce odors to a reasonable minimum.
- 5.4.2. Testing:** No test method required, monitoring, record keeping and reporting only.
- 5.4.3. Monitoring:** No action is necessary unless a complaint is received. If a complaint is received, the permittee shall initiate an investigation within four (4) hours after receiving the complaint to assess its validity. [WAC 173-401-615(1)]

5.4.4. Recordkeeping

- 5.4.4.1. Permittee shall maintain a written record of all complaints received. Record keeping shall include corrective action taken in response to complaints. [WAC 173-401-615(2)]
- 5.4.4.2. Maintain compliance documents for a period of five (5) years. [WAC 173-401-615(2)(c)]

5.4.5. Reporting

- 5.4.5.1. Permittee shall notify BCAA within three (3) working days of receipt of any valid complaint.
- 5.4.5.2. As part of the 6-month monitoring report required by Condition 1.13 and as part of the annual compliance certification report required by Condition 3.3, the permittee shall indicate whether any complaints have been received during the specified reporting period. The corrective action taken in response to complaints shall also be included in these reports. [WAC 173-401-615(3)]

5.5. Detrimental Emissions

Applicable Requirement 5 of 7: State (X)/Federal (X) WAC 173-400-040(6)

- 5.5.1. Description:** The permittee shall not cause or permit the emission of any air contaminant if it is detrimental to the health, safety, or welfare of any person, or causes damage to property or business.
- 5.5.2. Testing:** No test method required, monitoring, record keeping and reporting only.
- 5.5.3. Monitoring:** No action is necessary unless a complaint is received. If a complaint is received, the permittee shall initiate an investigation within four (4) hours after receiving the complaint to assess its validity. [WAC 173-401-615(1)]
- 5.5.4. Recordkeeping**
- 5.5.4.1. Permittee shall maintain a written record of all complaints received. Record keeping shall include corrective action taken in response to complaints. [WAC 173-401-615(2)]
- 5.5.4.2. Maintain compliance documents for a period of five (5) years. [WAC 173-401-615(2)(c)]
- 5.5.5. Reporting**
- 5.5.5.1. Permittee shall notify BCAA within three (3) working days of receipt of any valid complaint.
- 5.5.5.2. As part of the 6-month monitoring report required by Condition 1.13 and as part of the annual compliance certification report required by Condition 3.3, the permittee shall indicate whether any complaints have been received during the specified reporting period. The corrective action taken in response to complaints shall also be included in these reports. [WAC 173-401-615(3)]

5.6. Emission Masking

Applicable Requirement 6 of 7: State (X)/Federal (X) WAC 173-400-040(8)

- 5.6.1. Description** No person shall cause or permit the installation or use of any means, which conceal or mask an emission of an air contaminant.
- 5.6.2. Testing:** No test method required, monitoring, record keeping and reporting only.
- 5.6.3. Monitoring:** No specific monitoring actions are required. Compliance shall be assured via reasonable inquiry and certification by a responsible official of ongoing compliance at least once per reporting period. Such reasonable inquiry and certification shall constitute monitoring for purposes of compliance. [WAC 173-401-615(1)]
- 5.6.4. Recordkeeping:** Maintain the certification statement described in the Reporting section for a period of five (5) years. [WAC 173-401-615(2)(c)]
- 5.6.5. Reporting:** As part of the annual compliance certification report required by Condition 3.3, include a statement indicating the following “Based on information and belief formed after reasonable inquiry, no emission masking occurred during this reporting period.” This statement shall be signed by the responsible official. [WAC 173-401-615(3)]

5.7. Fugitive Dust

Applicable Requirement 7 of 7: State (X)/Federal (X) WAC 173-400-040(9)(a)

- 5.7.1. Description:** The owner or operator of a source of fugitive dust shall take reasonable precautions to prevent fugitive dust from becoming airborne and shall maintain and operate the source to minimize emissions.
- 5.7.2. Test Method:** No test method required, monitoring, record keeping and reporting only.
- 5.7.3. Monitoring:** No action is necessary unless a complaint is received. If a complaint is received, the permittee shall initiate an investigation within four (4) hours after receiving the complaint to assess its validity. [WAC 173-401-615(1)]
- 5.7.4. Record Keeping**
- 5.7.4.1. Permittee shall maintain a written record of all complaints received. Record keeping shall include corrective action taken in response to complaints. [WAC 173-401-615(2)]
- 5.7.4.2. Maintain compliance documents for a period of five (5) years. [WAC 173-401-615(2)(c)]
- 5.7.5. Reporting**
- 5.7.5.1. Permittee shall notify BCAA within three (3) working days of receipt of any valid complaint.
- 5.7.5.2. As part of the 6-month monitoring report required by Condition 1.13 and as part of the annual compliance certification report required by Condition 3.3, the permittee shall indicate whether any complaints have been received during the specified reporting period. The corrective action taken in response to complaints shall also be included in these reports. [WAC 173-401-615(3)]

5.8. Performance Testing

- 5.8.1. Description:** Various processes in this AOP have initial and continuous performance monitoring and testing requirements.
- 5.8.2.** Processes not in production do not required performance monitoring and testing.
- 5.8.2.1. For a process to be recognized as not in production, BCAA must be notified in certified correspondence, by the responsible official
- 5.8.2.2. Should Agrium resume production of an idle process, BCAA must be notified at least thirty (30) days in advance by certified correspondence, by the responsible official.
- 5.8.2.3. At the time that production is resumed all performance monitoring and testing requirements are again applicable
- 5.8.2.4. Certified correspondence for process status notification shall include the 6-month monitoring report required by Condition 1.13 and the annual compliance certification report required by Condition 3.3. The permittee shall report plant production status during the specified reporting period. [WAC 173-401-615(3); WAC 173-401-630(5)(a)]

6. APPLICABLE REQUIREMENTS – PROCESS SPECIFIC FOR KENNEWICK AREA

The Kennewick area of the Agrium facility consists of 36 processes of which 12 are designated as IEUs. Source-specific, Applicable Requirements for the remaining 25 processes are addressed in this section. The IEUs for this area are listed in Table 7 of the Statement of Basis and any Applicable Requirements for these IEUs are addressed in Section 9 of this permit. The remainder of this section details the monitoring, record keeping, and reporting requirements for processes with specific Applicable Requirements for the Kennewick area.

6.1. Process 2: Plant 9, Tailgas Stack

6.1.1. NO_x Limit: Applicable Requirement 1 of 4: State ()/Federal (X) 40 CFR 60.72(a)(1)

6.1.1.1. Description: NO_x Emissions from Plant 9

- 6.1.1.1.1. Shall not exceed 0.6 lb NO_x/T_{acid} averaged over all operating hours exclusive of startup and shutdown in any continuous twelve-month period. [PSD-04-01 First Amendment Condition 3.1]
- 6.1.1.1.2. Shall not exceed 400 pounds per calendar day exclusive of startup and shutdown [PSD-04-01 First Amendment Condition 3.2]
- 6.1.1.1.3. Shall not exceed 47 tons in any consecutive twelve-month period including startup and shutdown periods [PSD-04-01 First Amendment Condition 3.3]

6.1.1.2. Test Method for Compliance Determination: 40 CFR 60, App. A. Method 7, Method 7E as approved by EPA (6/8/06), or an approved alternate method, or Method 320 as approved by EPA (3/24/10).

- 6.1.1.2.1. If Method 320 is used, the tester must insure that no condensation be allowed to form in the sampling line by heating the sampling line up to and including the sampling cell [BCAA RO 2010-0003 5.2.2]
- 6.1.1.2.2. If Method 320 is used, the tester must follow the Quality Control procedures in Section 9.0 of Method 320 for all the compounds of interest and the recovery values must be within acceptable limits as defined by Method 320 [BCAA RO 2010-0003 5.2.3]
- 6.1.1.2.3. BCAA shall be notified of the procedure intended for use in the test plan submitted in advance of source testing [BCAA RO 2010-0003 5.2.4]

6.1.1.3. Continuous Emissions Monitoring for NO_x: Owner shall install, calibrate, maintain and operate a CEMS.

- 6.1.1.3.1. The span value shall be 500 ppm NO₂. [40 CFR 60.73(a)]
- 6.1.1.3.2. Periods of excess emission are defined in 40 CFR 60.73(e).
- 6.1.1.3.3. **Establishment of conversion factor:** The owner or operator shall establish a conversion factor for the purpose of converting monitoring data into units of the applicable standard (kg/metric ton, lb/ton). The conversion factor shall be established by measuring emissions with the continuous

monitoring system concurrent with measuring emissions with the applicable reference method tests. Using only that portion of the continuous monitoring emission data that represents emission measurements concurrent with the reference method test periods, the conversion factor shall be determined by dividing the reference method test data averages by the monitoring data averages to obtain a ratio expressed in units of the applicable standard to units of the monitoring data, i.e., kg/metric ton per ppm (lb/ton per ppm). The conversion factor shall be reestablished during any performance test under Sec. 60.8 or any continuous monitoring system performance evaluation under Sec. 60.13(c). [40 CFR 60.73(b)]

This conversion factor will be established from the data collected during the annual RATA (Condition 6.1.1.3.9.1.3).

- 6.1.1.3.4. CEMS are subject to Performance Specification 2 contained in 40 CFR 60, Appendix B. [40 CFR 60.13(c), 40 CFR 60.73(a)]

Instead of a NO_x concentration CEMS meeting Performance Specification 2, Agrium may apply an FTIR CEMS meeting the requirements of Performance Specification 15 of Appendix B of this part to measure NO_x concentrations.

Should Agrium use an FTIR CEMS, you must replace the Relative Accuracy Test Audit requirements of Procedure 1 of Appendix F of this part with the validation requirements and criteria of Performance Specification 15, sections 11.1.1 and 12.0, of Appendix B of this part. [40 CFR 60.73a (b)(5)]

- 6.1.1.3.5. Method, frequency and adjustment for calibration drifts monitoring is specified in 40 CFR 60.13(d)(1). [40 CFR 60.13(d)(1)]

- 6.1.1.3.6. CEMS with exceptions provided, must be in continuous operation and meet the frequency requirements of 40 CFR 60.13(e)(2) all continuous monitoring systems shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for each successive 15-minute period. [40 CFR 60.13(e)]

- 6.1.1.3.7. The CEMS shall be installed and located as specified in Performance Specification 2 of 40 CFR 60, Appendix B. [40 CFR 60.13(f)]

- 6.1.1.3.8. CEMS monitoring data is to be reduced to 1-hour average concentrations. [40 CFR 60.13(h)]

- 6.1.1.3.9. Quality Assurance/Quality Control: The permittee shall follow the Quality Assurance/Quality Control (QA/QC) plan described below for the CEMS:

6.1.1.3.9.1. Calibration Drift

- 6.1.1.3.9.1.1. The daily calibration drift shall be checked for both NO and NO₂ components of tailgas. The calibration gas concentrations for the daily CD test will be at zero and high level value (approximately 2.0 x the equivalent ppm value based on calculation from the PSD-04-01 mass limit.)

- 6.1.1.3.9.1.2. The unadjusted reference gas concentration measurement for both NO and NO₂ shall be recorded daily prior to resetting the

calibration. The calibration drift shall be measured at the zero and span values. After each calibration is complete, the amount of adjustment shall be recorded. If the calibration drift is in excess of $\pm 15\%$ or ± 5 ppm, whichever is greater, the CEMS system shall be investigated for operational problems and corrective actions shall be taken as necessary.

- 6.1.1.3.9.1.3. Relative accuracy test audit (RATA) – a RATA shall be conducted once per year
- 6.1.1.3.9.2. Cylinder Gas Audit CGA shall be conducted during three out of four calendar quarters. A RATA must be conducted during the remaining quarter following 40 CFR Part 60, Appendix F.² To conduct a CGA:
 - 6.1.1.3.9.2.1. Step 1: Challenge the pollutant portion of the CEMS with audit gases of known concentration for NO and NO₂ at two points bracketing at 2.0x and 0.5x the equivalent concentration in ppm based on the calculation from the PSD-04-01 mass limit – four calibration gases total. When challenging the CEMS, record the response three times at each measurement point. The monitor should be challenged for a sufficient period of time to assure adsorption-desorption of the CEMS sample transport surfaces has stabilized.
 - 6.1.1.3.9.2.2. Step 2: Operate each monitor in its normal sampling mode, i.e., pass the audit gas through all filters, scrubbers, conditioners, and other monitor components used during normal sampling, and as much of the sampling probes as is practical. At a minimum, the audit gas should be introduced at the connection between the probe and the sample line.
 - 6.1.1.3.9.2.3. Step 3: Use audit gases that have been certified by comparison to National Institute of Standards and Technology (NIST) gaseous Standard Reference Materials (SRM's) or NIST/EPA approved gas manufacturer's Certified Reference Materials (CRM's)³ following EPA Traceability Protocol No.1⁴. As an alternative to Protocol No. 1 audit gases, CRM's may be used directly as audit gases. Procedures for preparation of CRM's are described in Citation 1. Procedures for preparation of EPA Traceability Protocol 1 materials are described in Citation 2.

² PSD requires that 40 CFR Part 60, Appendix B, Specification 2 or 6 (as applicable) and CFR 40 Part 60, Appendix F, Quality Assurance Procedures be used. The Permittee may use gas audit standards containing both NO and NO₂ as approved by the Environmental Protection Agency letter to May 20, 2005 in the span check and in calibration.

³ "A Procedure for Establishing Traceability of Gas Mixtures to Certain National Bureau of Standards Standard Reference Materials." Joint publication by NBS and EPA-600/7-81-010. Available from the U.S. Environmental Protection Agency. Quality Assurance Division (MD-77). Research Triangle Park, NC 27711.

⁴ "Traceability Protocol for Establishing True Concentrations of Gases Used for Calibration and Audits of Continuous Source Emission Monitors (Protocol Number 1)" June 1978. Section 3.0.4 of the Quality Assurance Handbook for Air Pollution Measurement Systems. Volume III. Stationary Source Specific Methods. EPA-600/4-77-027b. August 1977. U.S. Environmental Protection Agency. Office of Research and Development Publications, 26 West St. Clair Street, Cincinnati, OH 45268.

6.1.1.4. Record Keeping

- 6.1.1.4.1. Daily production and hours of operation shall be recorded. [40 CFR 60.73(c)]
- 6.1.1.4.2. All monitoring data and support information shall be retained for a period of five (5) years. This supersedes 40 CFR 60.7(f), which stipulates record retention of all required measurements for only two (2) years. [WAC 173-401-615(2)(c)]
- 6.1.1.4.3. The difference between the actual concentration of the audit gas and the concentration indicated by the CEMS is used to assess the accuracy. If the average difference between the CEMS values and the audit gas values is not within ± 15 percent of the audit gas value or ± 5 ppm, whichever is greater, the CEMS system shall be investigated for operational problems and corrective actions taken as necessary.

6.1.1.5. Reporting: The permittee shall, semi-annually, submit:

- 6.1.1.5.1. Excess emission and monitoring systems performance report;
- 6.1.1.5.2. Summary report as described in 40 CFR 60.7(c) and (d);
- 6.1.1.5.3. Summary report of the Calibration Drift tests; and
- 6.1.1.5.4. Report of the CGA results;
- 6.1.1.5.5. Report of the RATA test results [40 CFR 60.7(c) and (d)]
- 6.1.1.5.6. Permittee may request reduction of the frequency of reporting of excess emissions and CMS performance report if conditions specified in 40 CFR 60.7(e)(1)(i), (ii), and (iii) are met and the reduced frequency has been approved by the permitting agency. [40 CFR 60.7(e)(1)].

6.1.2. Opacity Limit: Applicable Requirement 2 of 4: State ()/Federal (X) 40 CFR 60.72(a)(2)

6.1.2.1. Description: Allowable emission limit for opacity is 10%.

6.1.2.2. Test Method

- 6.1.2.2.1. Test Method 1: Qualitative Assessment
- 6.1.2.2.2. Test Method 2: 40 CFR 60 Appendix A Method 9 (if required)

6.1.2.3. Monitoring: The following procedures shall constitute monitoring for purposes of compliance: [WAC 173-401-615(1)(b)]

- 6.1.2.3.1. A qualitative assessment of the visual emissions of each emission point, listed in the Applicable Requirement section above, shall be conducted weekly by plant personnel. Plant personnel may be certified, previously certified, or non-certified but is thoroughly knowledgeable of the "Visible Emissions Field Manual Methods 9 and 22"⁵.

⁵ Environmental Protection Agency. 1993. Visible Emissions Field Manual: EPA Method 9 and 22. Research Triangle Park, NC: Office of Air Quality Planning and Standards (EPA 340/1-92-004).

6.1.2.3.2. If any visible emission occurs that has the potential to exceed the applicable opacity standard, the permittee shall take the following action(s):

6.1.2.3.2.1. Action 1: Verify that the equipment and/or control device causing the emission problem is operating according to manufacturer's specifications or other site-specific acceptable operating conditions. If the equipment or control device is not operating properly, the permittee shall take corrective action immediately to eliminate excess visible emissions.

6.1.2.3.2.2. Action 2: Conduct an opacity test per EPA Method 9 if the corrective action taken in Action 1 does not rectify the opacity problem within two (2) hours. Reporting of opacity as a process upset under 1.13 should only be required when Action 2 corrective actions does not rectify a minor opacity problem within 2 hours.

6.1.2.3.2.3. Action 3: Conduct an opacity test per EPA Method 9 daily until corrective action successfully rectifies the opacity problem.

6.1.2.4. Record Keeping

6.1.2.4.1. The date and results of the qualitative assessments of visual emissions shall be recorded. [WAC 173-401-615(2)]

6.1.2.4.2. All required EPA Method 9 observations shall be recorded on a form similar to Figure 9-2, 40 CFR 60 Appendix A Method 9.

6.1.2.4.3. Maintain compliance documents for a period of five (5) years. [WAC 173-401-615(2)(c)]

6.1.2.5. Reporting: The permittee shall, semi-annually, submit.

6.1.2.5.1. The date and results of the qualitative assessments shall be submitted to BCAA during the reporting period in which the assessments were performed. [WAC 173-401-615(3)(a)]

6.1.2.5.2. All required EPA Method 9 observations shall be submitted to BCAA during the reporting period in which the tests were performed. [WAC 173-401-615(3)(a)]

6.1.2.5.3. Specific to this Applicable Requirement the permittee shall report according to section 1.13. [WAC 173-401-615(3); WAC 173-401-645(3)(d); WAC 173-400-107(3); WAC 173-400-107(4); WAC 173-400-107(5)]

6.1.3. NO_x Mass Limits: Applicable Requirement 3 of 4: State ()/Federal (X)

First Amendment to Ecology Order of Approval (OA) DE 76-282 (See Table 5 of Statement of Basis)

6.1.3.1. Description

6.1.3.1.1. Production of nitric acid shall not be limited by OA DE 76-282 as long as Plant 9 is not modified from the plans and specifications submitted in the application for OA DE 76-282 in such a way as to trigger new source review under either Washington State or Federal regulations. [First Amendment to OA DE 76-282, Condition 5.1.2]

6.1.3.2. Test Method: Continuous Emissions Monitoring (CEM) as required under 40 CFR 60.73 [First Amendment to OA DE 76-282, Condition 5.1.1]

6.1.3.3. Monitoring

6.1.3.3.1. Monitoring for NO_x in the exhaust gas from Plant 9 shall be by CEM. [First Amendment to OA DE 76-282, Condition 5.1.1]

6.1.3.3.2. NO_x, expressed as nitrogen dioxide, emissions shall be determined from CEM records. [First Amendment to OA DE 76-282, Condition 5.1.5]

6.1.3.4. Record Keeping: All monitoring data and support information shall be retained for a period of five (5) years. [WAC 173-401-615(2)(c)]

6.1.3.5. Reporting: Within 15 days of the end of each month, report to BCAA the daily and continuous 12 month NO_x emissions, expressed as nitrogen dioxide. [First Amendment to Ecology OA DE 76-282, Condition 5.1.4]

6.1.4. NO_x Requirements for Plant 9: Applicable Requirement 4 of 4: State () /Federal (X) PSD-04-01

6.1.4.1. Description: NO_x Emissions from Plant 9

6.1.4.1.1. Shall not exceed 0.6 lb NO_x/T_{acid} averaged over all operating hours exclusive of startup and shutdown in any continuous twelve-month period. [PSD-04-01 First Amendment Condition 3.1]

6.1.4.1.2. Shall not exceed 400 pounds per calendar day exclusive of startup and shutdown [PSD-04-01 First Amendment Condition 3.2]

6.1.4.1.3. Shall not exceed 47 tons in any consecutive twelve-month period including startup and shutdown periods [PSD-04-01 First Amendment Condition 3.3]

6.1.4.1.4. Startup shall begin with gauze light-off:

6.1.4.1.4.1. Shall not last more than two hours per startup [PSD-04-01 Condition 3.5.1]

6.1.4.1.4.2. The CEMS for NO_x will continue operation during startup. [PSD-04-01 Condition 3.5.2]

6.1.4.1.5. Shutdown:

6.1.4.1.5.1. Shall begin with cessation of NH₃ feed to the NH₃ converter [PSD-04-01 Condition 3.6.1]

6.1.4.1.5.2. Shall end when the process compressors are turned off [PSD-04-01 Condition 3.6.2]

6.1.4.1.5.3. The CEMS for NO_x will continue operation during shutdown. [PSD-04-01 Condition 3.6.3]

6.1.4.1.6. Test Methods: Compliance with Condition 6.1.4.1 shall be determined in accordance with 40 CFR Part 60.74 (Test methods and procedures). [PSD-04-01 3.7.1]

- 6.1.4.1.6.1. Method 7E may be used for compliance determination. [PSD-04-01 Condition 3.7.2.4] and as approved by EPA (6/8/06)
- 6.1.4.1.6.2. 40 CFR 60, App. A. Method 7 may be used for compliance determination [PSD-04-01 3.7.1]
- 6.1.4.1.6.3. Method 320, as approved by EPA (3/24/10) may be used for compliance determination [BCAA RO 2010-0003 5.2.1]
 - 6.1.4.1.6.3.1. If Method 320 is used, the tester must insure that no condensation be allowed to form in the sampling line by heating the sampling line up to and including the sampling cell [BCAA RO 2010-0003 5.2.2]
 - 6.1.4.1.6.3.2. The tester must follow the Quality Control procedures in Section 9.0 of Method 320 for all the compounds of interest and the recovery values must be within acceptable limits as defined by Method 320 [BCAA RO 2010-0003 5.2.3]
 - 6.1.4.1.6.3.3. BCAA shall be notified of the procedure intended for use in the test plan submitted in advance of source testing [BCAA RO 2010-0003 5.2.4]

6.1.4.1.6.4. Compliance Monitoring

- 6.1.4.1.6.4.1. Compliance monitoring for Conditions 6.1.4.1 shall begin immediately with the final and effective date of PSD-04-01 [PSD-04-01 Condition 3.7.3.2]
 - 6.1.4.1.6.4.2. Benchmark performance and continuous compliance will be monitored by a CEMS that measures and records NO_x emissions from the Plant 9 tail gas stack on not less than an hourly average basis. [PSD-04-01 Condition 3.7.3.4]
 - 6.1.4.1.6.4.3. The CEMS will meet the requirements of Condition 6.1.4.2. [PSD-04-01 Condition 3.7.3.5]
- 6.1.4.1.7. Continuous Compliance Indication/Determination** – continuous compliance will be indicated by the continuous emissions monitoring described in Condition 6.1.1.3 and 6.1.4.2.

6.1.4.2. Continuous Emission Monitoring System for NO_x

- 6.1.4.2.1. CEMS for NO_x will satisfy the requirements contained in 40 CFR Part 60, Appendix B, Performance Specification 2 or 6 (as applicable) and 40 CFR Part 60, Appendix F, Quality Assurance Procedures ((Section 6.1.1 for CGA requirements) [PSD 04-01 Condition 5.1]
- 6.1.4.2.2. The CEMS for NO_x will satisfy the requirements contained in 40 CFR Part 64.3(d): Special criteria for the use of continuous emission, opacity or predictive monitoring system. If a continuous emission monitoring system (CEMS) is required pursuant to other authority under the Clean Air Act or state or local law, the owner or operator shall use such system to satisfy the requirements of this part. [40 CFR 64.3(d)]

6.1.4.2.3. The CEMS for NO_x shall have a minimum data availability requirement of 95%, (5% CEMS downtime) during each monitoring reporting period. [40 CFR 64.6(c)(4)]

6.1.4.2.4. Operational Requirements: CEMS for NO_x will satisfy the operational requirements contained in 40 CFR Part 64.7:

6.1.4.2.4.1. Commencement of operation: The owner or operator shall conduct the monitoring required under this part upon issuance of a part 70 or 71 permit that includes such monitoring, or by such later date specified in the permit pursuant to § 64.6(d). [40 CFR 64.7(a)]

6.1.4.2.4.2. Proper maintenance: At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment. [40 CFR 64.7(b)]

6.1.4.2.4.3. Continued operation: Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. [40 CFR 64.7(c)]

6.1.4.2.4.4. Response to excursions or exceedances: [40 CFR 64.7(d)]

6.1.4.2.4.4.1. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or

any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

6.1.4.2.4.4.2. Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

6.1.4.2.4.5. Documentation of need for improved monitoring.

After approval of monitoring under this part, if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the part 70 or 71 permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. [40 CFR 64.7(e)]

6.1.4.2.5. Quality Improvement Plan (QIP) Requirements

6.1.4.2.5.1. Based on the results of a determination made under § 64.7(d)(2), the Administrator or the permitting authority may require the owner or operator to develop and implement a QIP. Consistent with § 64.6(c)(3), the part 70 or 71 permit may specify an appropriate threshold, such as an accumulation of exceedances or excursions exceeding 5 percent duration of a pollutant-specific emissions unit's operating time for a reporting period, for requiring the implementation of a QIP. The threshold may be set at a higher or lower percent or may rely on other criteria for purposes of indicating whether a pollutant-specific emissions unit is being maintained and operated in a manner consistent with good air pollution control practices. [40 CFR 64.8(a)]

6.1.4.2.5.2. Elements of a QIP [40 CFR 64.8(b)]

6.1.4.2.5.2.1. The owner or operator shall maintain a written QIP, if required, and have it available for inspection.

6.1.4.2.5.2.2. The plan initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the owner or operator shall modify the plan to include procedures for conducting one or more of the following actions, as appropriate:

- Improved preventive maintenance practices.
- Process operation changes.
- Appropriate improvements to control methods.
- Other steps appropriate to correct control performance.
- More frequent or improved monitoring

6.1.4.2.5.3. If a QIP is required, the owner or operator shall develop and implement a QIP as expeditiously as practicable and shall notify the permitting authority if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined. . [40 CFR 64.8(c)]

6.1.4.2.5.4. Document Following implementation of a QIP, upon any subsequent determination pursuant to § 64.7(d)(2) the Administrator or the permitting authority may require that an owner or operator make reasonable changes to the QIP if the QIP is found to have: [40 CFR 64.8(d)]

6.1.4.2.5.4.1. Failed to address the cause of the control device performance problems; or

6.1.4.2.5.4.2. Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions

6.1.4.2.5.5. Implementation of a QIP shall not excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the Act. . [40 CFR 64.8(e)]

6.1.4.2.6. Reporting and Recordkeeping Requirements: The permittee will satisfy the requirements contained in 40 CFR Part 64.9 regarding the B CEMS for NO_x

6.1.4.2.6.1. General reporting requirements [40 CFR 64.9(a)]

6.1.4.2.6.1.1. On and after the date specified in § 64.7(a) by which the owner or operator must use monitoring that meets the requirements of this part, the owner or operator shall submit monitoring reports to the permitting authority in accordance with § 70.6(a)(3)(iii) of this chapter.

6.1.4.2.6.1.2. A report for monitoring under this part shall include, at a minimum, the information required under § 70.6(a)(3)(iii) of this chapter and the following information, as applicable:

(i) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;

(ii) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, quarterly cylinder gas audits, and other calibration activities as applicable); and

(iii) A description of the actions taken to implement a QIP during the reporting period as specified in § 64.8. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring.

6.1.4.2.6.2. General Recordkeeping requirements [40 CFR 64.9(b)]

6.1.4.2.6.2.1. The owner or operator shall comply with the recordkeeping requirements specified in § 70.6(a)(3)(ii) of this chapter. The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to § 64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).

6.1.4.2.6.2.2. Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.

6.1.4.3. Agrium will provide safe access and sampling ports for source testing of each exhaust stack after the final pollution control device:

- 6.1.4.3.1. Safe access will consist of permanently constructed platforms on the stacks [PSD 04-01 Condition 6.1]
- 6.1.4.3.2. The sampling ports will meet the requirement of CFR Part 60 Appendix A Method 1. [PSD 04-01 Condition 6.2]
- 6.1.4.3.3. Other arrangements may be acceptable if approved by Ecology prior to installation. [PSD 04-01 Condition 6.3]

6.1.4.4. Record Keeping: Agrium will notify and report to BCAA as follows:

- 6.1.4.4.1. Notifications and reports will be in a written or electronic format approved by BCAA. [PSD 04-01 Condition 7.1]

- 6.1.4.4.1.1. Completion of the entry into the operation and maintenance manual of the items specified in Condition 6.1.4.5, within fifteen days after such entries were completed. [PSD 04-01 Condition 7.2.3]

6.1.4.4.2. Reporting The following reports shall be submitted to BCAA

- 6.1.4.4.2.1. Continuous performance monitoring reports required under Condition 6.1.4.4.2.2. shall be submitted for each six-month period ending in June and December. [PSD 04-01 Condition 7.3.2]

- 6.1.4.4.2.2. Continuing performance monitoring reports will include but not necessarily be limited to the following:

- 6.1.4.4.2.2.1.1 Certification by the responsible party for the facility that the relevant equipment was operated and maintained in accordance with the operational parameters and practices developed pursuant to Condition 6.1.4.5. [PSD 04-01 Condition 7.3.3.1]

- 6.1.4.4.2.2.2. Pursuant to compliance under Conditions 6.1.4.2, NO_x emissions since the last report: [PSD 04-01 Condition 7.3.3.2]

- 6.1.4.4.2.2.3. The duration and nature of any CEMS down-time excluding zero and span checks since the last report. [PSD 04-01 Condition 7.3.3.9]

- 6.1.4.4.2.2.4. Results of any CEMS audits or accuracy checks since the last report [PSD 04-01 Condition 7.3.3.10]

- 6.1.4.4.2.3. Each occurrence of monitored NO_x emissions (Condition 6.1.4.1.) measured in excess of the limits shall be reported in writing to BCAA after the respective exceedance in accordance with WAC 173-400-107(3). Such reports shall as a minimum include:

- 6.1.4.4.2.3.1. The time of the occurrence [PSD 04-01 Condition 7.3.4.1]

- 6.1.4.4.2.3.2. Magnitude of divergence from the limit [PSD 04-01 Condition 7.3.4.2]

- 6.1.4.4.2.3.3. The duration of the divergence [PSD 04-01 Condition 7.3.4.3]

- 6.1.4.4.2.3.4. The probable cause [PSD 04-01 Condition 7.3.4.4]

- 6.1.4.4.2.3.5. Corrective actions taken or planned [PSD 04-01 Condition 7.3.4.5]

- 6.1.4.4.2.3.6. Any other agency contacted [PSD 04-01 Condition 7.3.4.6]

- 6.1.4.4.3. Agrium will maintain monitoring, source test, CEM audit tests, and process records:

- 6.1.4.4.3.1. At the Kennewick facility [PSD 04-01 Condition 7.4.1]

- 6.1.4.4.3.2. For at least five years. [PSD 04-01 Condition 7.4.2]

6.1.4.4.3.3. Monitoring and process records that include time and duration of startups and shutdowns of Plant 9 [PSD 04-01 Condition 7.4.3]

6.1.4.4.3.4. Agrium will provide BCAA with monitoring and process records for any period within the five year archive within ten working days of request. [PSD 04-01 Condition 7.4.4]

6.1.4.5. Operation and maintenance (O&M) manual for the facility:

6.1.4.5.1. Agrium will identify operational parameters and practices for Plant 9 that constitute proper operation relative to compliance with the emission limitation conditions of this permit. [PSD 04-01 Condition 8.1]

6.1.4.5.2. Agrium will include these operational parameters and practices in the KFO O&M manual. As a minimum and to the extent they related to the emission limitations and operating requirements specified in the conditions of PSD-04-01 permit, these will include:

6.1.4.5.2.1. Manufacturers' operating instructions and design specifications [PSD 04-01 Condition 8.2.1]

6.1.4.5.2.2. Normal operating parameters [PSD 04-01 Condition 8.2.2]

6.1.4.5.2.3. Updates to reflect any modification of the equipment or its operating procedures [PSD 04-01 Condition 8.2.3]

6.1.4.5.3. Agrium will keep the operational parameters and practices in the O&M manual up to date to the extent that they relate to the emission limitations and operating requirements specified in the condition of PSD-04-01 permit [PSD 04-01 Condition 8.3]

6.1.4.5.4. Agrium will keep the O&M manual readily available at KFO for review by state, federal, and local agencies. [PSD 04-01 Condition 8.4]

6.1.4.5.5. Within thirty days of request from BCAA, Agrium shall submit the O&M manual to the requesting agency for approval of any elements relevant to the emission limitations specified in the conditions of PSD-04-01 permit. [PSD 04-01 Condition 8.5]

6.1.4.6. Access - Subject to RCW 70.94.200, Agrium will permit the Environmental Protection Agency, state and local regulatory personnel access to the source upon request for the purposes of compliance assurance inspections. [PSD 04-01 Condition 10]

6.1.4.7. Nothing in this determination will be construed so as to relieve Agrium of its obligations under any state, local, or federal laws or regulations. [PSD 04-01 Condition 9]

6.1.4.8. Expander

6.1.4.8.1. The Kennewick Plant operates Plant 9 using either of two expanders. While one is in service the other is on standby in storage. Each expander has to routinely be taken out of service for maintenance. The expanders are identified by their serial numbers which are incorporated into their equipment numbers, specifically E-4618 and E-2560. Either expander can be used in the process as long as the existing BACT control limitations are met. [BCAA RO 2010-0003 Condition 5.1.1]

- 6.1.4.8.2. BCAA shall be notified within thirty (30) days of expander replacement. [BCAA RO 2010-0003 Condition 5.1.2]

6.1.5. N₂O Monitoring Requirements for Plant 9: Applicable Requirement 5 of 5: State () /Federal (X) 40 CFR Part 98

6.1.5.1. Description: N₂O Emissions from Plant 9

- 6.1.5.1.1. N₂O Emissions from Plant 9 shall be measured according to the monitoring requirements of EPA. [BCAA RO 2011-0007 Condition 2.1]
- 6.1.5.1.2. A continuous flow meter shall be installed. [BCAA RO 2011-0007 Condition 2.1]
- 6.1.5.1.3. The continuous flow meter shall be operated and maintained according to standard engineering practice. [BCAA RO 2011-0007 Condition 5.1.1]
- 6.1.5.1.4. The FTIR CEMS currently in place will be used to monitor and report N₂O emissions for Plant 9. [BCAA RO 2011-0007 Condition 5.3.1]
- 6.1.5.1.5. The Quality Assurance and Quality Control programs currently in place for the FTIR CEMS will be used for N₂O monitoring. [BCAA RO 2011-0007 Condition 5.3.2]
- 6.1.5.1.6. EPA approved the existing FTIR CEMS and QA/QC for GHG monitoring and reporting for report year 2011 as “an alternative method for determining N₂O emissions” according to 40 CFR 98.223(a)(2). This approval must be renewed in accordance with EPA requirements.
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6.2. Process 2A: Plant 9, Nitric Acid Plant Shutdown Vent

Applicable Requirement 1 of 1: State ()/Federal(X); 40 CFR 60.8(c)

- 6.2.1. Description:** Emissions during start-up, shutdown, and malfunctions shall not be considered a violation of applicable emission limits. [40 CFR 60.8]
- 6.2.2. Test Method:** No test method required, record keeping and reporting only
- 6.2.3. Monitoring:** No monitoring required, record keeping and reporting only
- 6.2.4. Record Keeping:** Operating records shall be retained for a period of five (5) years. [WAC 173-401-615(2)(c)]
- 6.2.5. Reporting:** Scheduled start-ups and shutdowns of nitric acid Plant 9 shall be reported by telephone, fax, or e-mail prior to its occurrence. Unscheduled shutdowns shall be reported as soon as possible. [WAC 173-400-107(3)]

6.3. Process 2B: Plant 9, Nitric acid plant process stack during start-up

Applicable Requirement 1 of 1: State ()/Federal(X); 40 CFR 60.8(c)

- 6.3.1. Description:** Emissions during start-up, shutdown, and malfunctions shall not be considered a violation of applicable emission limits. [40 CFR 60.8]
- 6.3.2. Test Method:** No test method required, record keeping and reporting only
- 6.3.3. Monitoring:** No monitoring required, record keeping and reporting only
- 6.3.4. Record Keeping:** Operating records (logs) shall be retained for a period of five (5) years from the date of the monitoring. [WAC 173-401-615(2)(c)]
- 6.3.5. Reporting:** Scheduled start-ups and shutdowns of nitric acid Plant 9 shall be reported by telephone, fax or e-mail prior to its occurrence. Unscheduled shutdowns shall be reported as soon as possible. [WAC 173-400-107(3)]

6.4. Process 3: Plant 7, Tailgas stacks

6.4.1. NO_x Emission Limits and Monitoring Requirements; Applicable Requirement 1 of 3: State ()/Federal (X)

6.4.1.1. **Test Method:** No test method required, monitoring, record keeping, and reporting only

6.4.1.2. **Monitoring:** The following regulatory requirements are based on those cited in BCAA RO 199901:

- 6.4.1.2.1. NO₂ concentrations of the plant emission shall be measured by CEMS. [BCAA RO 199901, Condition 3]
- 6.4.1.2.2. Compliance with the NO₂ weekly average emission shall be determined by the arithmetic average of all 1-hour NO₂ concentrations taken during any calendar week when the plant is operating. [BCAA RO 199901, Condition 4]
- 6.4.1.2.3. Data recorded during periods of plant start-up and shutdowns as well as CEMS breakdowns, repairs, calibration checks, and zero and span adjustments shall not be included in the data averages. [BCAA RO 199901, Condition 5]
- 6.4.1.2.4. Periods of excess emissions of NO₂ shall be defined as any calendar week during which the arithmetic average of all 1-hour periods as measured by CEMS exceeds the emissions standards. [BCAA RO 199901, Condition 6]
- 6.4.1.2.5. Owner shall install, calibrate, maintain, and operate a CEMS. [BCAA RO 199901, Condition 9, 40 CFR 60.73(a)]
- 6.4.1.2.6. CEMS are subject to Performance Specification 2 contained in 40 CFR 60, Appendix B. [BCAA RO 199901, Condition 11, 40 CFR 60.13(c)]
- 6.4.1.2.7. Method, frequency, and adjustment for calibration drifts monitoring is specified in 40 CFR 60.13(d)(1). [BCAA RO 199901, Condition 10, 40 CFR 60.13(d)(1)].
- 6.4.1.2.8. CEMS, with exceptions provided, must be in continuous operation. [BCAA RO 199901, Condition 12, 40 CFR 60.13(e)]
- 6.4.1.2.9. The CEMS shall be installed and located as specified in Performance Specification 2 of 40 CFR 60, Appendix B. [BCAA RO 199901, Condition 10, 40 CFR 60.13(f)].
- 6.4.1.2.10. CEMS monitoring data is to be reduced to 1-hour average concentrations. [BCAA RO 199901, Condition 10, 40 CFR 60.13(h)]
- 6.4.1.2.11. The permittee shall follow the Quality Assurance/Quality Control (QA/QC) plan described below for the CEMS:
 - 6.4.1.2.11.1. Calibration Drift – The daily calibration drift shall be checked for both NO and NO₂ components of the tailgas. The calibration gas concentration for the daily CD test will be at zero and high level value (approximately 2.0x times the equivalent ppm value based on calculation from the PSD-04-01 mass limit). The unadjusted reference gas concentration measurement for both NO and NO₂

shall be recorded daily prior to resetting the calibration. After each calibration is complete, the amount of adjustment shall be recorded. If the calibration drift is in excess of $\pm 15\%$ or ± 5 ppm, the CEMS system shall be investigated for operational problems and corrective actions shall be taken as necessary.

6.4.1.2.11.2. Relative Accuracy Test Audit (RATA) – a RATA shall be conducted once per year.

6.4.1.2.11.3. A CGA shall be conducted during three out of four calendar quarters. A RATA must be conducted during the remaining quarter following 40 CFR Part 60, Appendix F. To conduct a CGA:

6.4.1.2.11.3.1. Step 1: Challenge the pollutant portion of the CEMS with audit gases of known concentration for NO and NO₂ at two points bracketing at 2.0x and 0.5x the equivalent concentration in ppm based on the calculation from the PSD-04-01 mass limit – four calibration gases total. When challenging the CEMS, record the response three times at each measurement point. The monitor should be challenged for a sufficient period of time to assure adsorption-desorption of the CEMS sample transport surfaces has stabilized.

6.4.1.2.11.3.2. Step 2: Operate each monitor in its normal sampling mode, i.e., pass the audit gas through all filters, scrubbers, conditioners, and other monitor components used during normal sampling, and as much of the sampling probes as is practical. At a minimum, the audit gas should be introduced at the connection between the probe and the sample line.

6.4.1.2.11.3.3. Step 3: Use audit gases that have been certified by comparison to National Institute of Standards and Technology (NIST) gaseous Standard Reference Materials (SRM's) or NIST/EPA approved gas manufacturer's Certified Reference Materials (CRM's)⁶ following EPA Traceability Protocol No.1⁷. As an alternative to Protocol No. 1 audit gases, CRM's may be used directly as audit gases. Procedures for preparation of CRM's are described in Citation 1. Procedures for preparation of EPA Traceability Protocol 1 materials are described in Citation 2.

6.4.1.2.11.3.4. The difference between the actual concentration of the audit gas and the concentration indicated by the CEMS is

⁶ "A Procedure for Establishing Traceability of Gas Mixtures to Certain National Bureau of Standards Standard Reference Materials." Joint publication by NBS and EPA-600/7-81-010. Available from the U.S. Environmental Protection Agency. Quality Assurance Division (MD-77). Research Triangle Park, NC 27711.

⁷ "Traceability Protocol for Establishing True Concentrations of Gases Used for Calibration and Audits of Continuous Source Emission Monitors (Protocol Number 1)" June 1978. Section 3.0.4 of the Quality Assurance Handbook for Air Pollution Measurement Systems. Volume III. Stationary Source Specific Methods. EPA-600/4-77-027b. August 1977. U.S. Environmental Protection Agency. Office of Research and Development Publications, 26 West St. Clair Street, Cincinnati, OH 45268.

used to assess the accuracy. If the average difference between the CEMS values and the audit gas values is not within ± 15 percent of the audit gas value or ± 5 ppm, whichever is greater, the CEMS system shall be investigated for operational problems and corrective actions taken as necessary.

6.4.1.3. Record Keeping:

- 6.4.1.3.1. All required monitoring data and support information shall be retained for a period of five (5) years. [BCAA RO 199901, Condition 22, WAC 173-401-615(2)(c)]
- 6.4.1.3.2. An Operation and maintenance plan for plant 7, approved by BCAA, must be available at the Kennewick Plant. [BCAA RO 199901, Condition 16]

6.4.1.4. Reporting:

- 6.4.1.4.1. The permittee shall, semi-annually, submit:
 - 6.4.1.4.1.1. Excess emission and monitoring systems performance report;
 - 6.4.1.4.1.2. Summary report as described in 40 CFR 60.7(c) ;
 - 6.4.1.4.1.3. Summary report of the Calibration Drift tests; and
 - 6.4.1.4.1.4. Report of the CGA results [BCAA RO 199901, 40 CFR 60.7(c)]
 - 6.4.1.4.1.5. Report of RATA test results [PSD-04-01]
- 6.4.1.4.2. That, data assessment report in format similar to Figure 1 of 40 CFR 60, Appendix F shall be submitted within 60 days after completion. [BCAA RO 199901, Condition 18, 40 CFR 60.13(c)(2)]

6.4.2. Opacity Limit: Applicable Requirement 2 of 3: State (X)/Federal (X)

WAC 173-400-040(2) and BCAA RO 199901

6.4.2.1. Description: Opacity shall not exceed 20%

6.4.2.2. Test Method:

- 6.4.2.2.1. Test Method 1: Qualitative Assessment:
- 6.4.2.2.2. Test Method 2: 40 CFR 60 Appendix A Method 9 (if required)

6.4.2.3. Monitoring:

- 6.4.2.3.1. A qualitative assessment of visual emissions shall be performed and recorded weekly. [BCAA RO 199901, Condition 14]
- 6.4.2.3.2. For emissions perceived or believed to be in exceedance of the opacity standard, the permittee shall conduct a visual emissions test using EPA Method 9. [BCAA RO 199901, Condition 15]

6.4.2.4. Record Keeping:

- 6.4.2.4.1. The date and results of the qualitative assessments of visual emissions shall be recorded. [WAC 173-401-615(2)]

- 6.4.2.4.2. All required EPA Method 9 observations shall be recorded on a form similar to Figure 9-2, 40 CFR 60 Appendix A Method 9.
- 6.4.2.4.3. Maintain compliance documents for a period of five (5) years. [WAC 173-401-615(2)(c)]
- 6.4.2.5. **Reporting:**
 - 6.4.2.5.1. The date and results of the qualitative assessments shall be submitted to BCAA during the reporting period in which the assessments were performed. [WAC 173-401-615(3)(a)]
 - 6.4.2.5.2. Results of all visual observations conducted by EPA Method 9 shall be submitted semi-annually. [BCAA RO 199901, Condition 20]
 - 6.4.2.5.3. Specific to this Applicable Requirement the permittee shall report according to section 1.13. [WAC 173-401-615(3); WAC 173-401-645(3)(d); WAC 173-400-107(3); WAC 173-400-107(4); WAC 173-400-107(5)]

6.4.3. PSD-04-01 Requirements for Plant 7, Tailgas Stack:

Applicable Requirement 3 of 3: State (X)/Federal (X); PSD-04-01

6.4.3.1. Description: NO_x Limit

- 6.4.3.1.1. Shall not exceed 0.524 lb NO_x/ T_{acid} averaged over all operating hours exclusive of startup and shutdown in any continuous twelve month period. [PSD 04-01 Condition 1.1]
- 6.4.3.1.2. Shall not exceed 140 pounds on any calendar day (lb/calendar-day) exclusive of startup and shutdown from 0:00 hours, November 1st through 24:00 hours April 30th in any calendar year [PSD 04-01 Condition 1.2]
- 6.4.3.1.3. Shall not exceed 190 pounds on any calendar day (lb/calendar-day) exclusive of startup and shutdown from 0:00 hours, May 1st through 24:00 hours October 31st in any calendar year [PSD 04-01 Condition 1.3]
- 6.4.3.1.4. Shall not exceed 27 tons in any consecutive twelve month period including startup and shutdown periods [PSD 04-01 Condition 1.4]
- 6.4.3.1.5. Startup shall begin with gauze light-off: [PSD 04-01 Condition 1.5]
 - 6.4.3.1.5.1. Process flow may bypass the expander, NO_x control, and continuous emissions monitoring system (CEMS),
 - 6.4.3.1.5.1.1. For not more than two hours [PSD 04-01 Condition 1.5.1.1]
 - 6.4.3.1.5.1.2. NO_x emissions shall be prorated for determination of annual NO_x emissions at a rate of 314 lb NO_x/hr during this bypass period. [PSD 04-01 Condition 1.5.1.2]
 - 6.4.3.1.5.2. Ammonia (NH₃) feed to the NO_x control system shall begin not later than when the NO_x control system reaches an operating temperature of 350 °F . [PSD 04-01 Condition 1.5.2]

6.4.3.1.5.3. Startup shall be complete not later than two hours after initiating ammonia feed to the NO_x control system. [PSD 04-01 Condition 1.5.3]

6.4.3.1.6. Shutdown:

6.4.3.1.6.1. Shall begin with cessation of NH₃ feed to the NH₃ oxidizer [PSD 04-01 Condition 1.6.1]

6.4.3.1.6.2. Shall end when the process compressors are turned off [PSD 04-01 Condition 1.6.2]

6.4.3.2. Test Method:

6.4.3.2.1. Compliance determination, demonstration, and monitoring: Compliance for Conditions 6.4.3.1.1, 6.4.3.1.2, 6.4.3.1.3, and 6.4.3.1.4 shall be determined in accordance with 40 CFR Part 60.74 (Test methods and procedures) [PSD 04-01 Condition 1.7.1]

6.4.3.3. Monitoring

6.4.3.3.1. Initial performance test

6.4.3.3.1.1. Within 60 days of achieving the maximum HNO₃ production rate after beginning operation with NO_x emissions controls equivalent to BACT, but not later than 10 days after initial startup of NO_x emissions controls equivalent to BACT, Agrium will conduct a performance test for Condition 6.4.3.1.1 or 6.4.3.1.3 (depending on the coincident time of year) [PSD 04-01 Condition 1.7.2.1]

6.4.3.3.1.2. During the initial performance test, Plant 7 shall run at not less than 90% of the acid production capacity.[PSD 04-01 Condition 1.7.2.2]

6.4.3.3.1.3. Agrium will submit a test plan to BCAA for approval after at least 30 days prior to initial performance testing. [PSD 04-01 Condition 1.7.2.3]

6.4.3.3.1.4. Method 7E may be used for compliance monitoring.) [PSD 04-01 Condition 1.7.2.4] Method 320, as approved by EPA (3/24/10) may be used for compliance determination [BCAA RO 2010-0003 5.2.1]

6.4.3.3.2. Compliance monitoring for Conditions 6.4.3.1.1, 6.4.3.1.2, 6.4.3.1.3, and 6.4.3.1.4 shall begin at the time of initial operation of NO_x emission controls equivalent to BACT. [PSD 04-01 Condition 1.7.3]

6.4.3.3.2.1. Continuous compliance will be monitored by a continuous emissions monitoring system (CEMS) that measure and records NO_x emissions from Plant 7's tail gas stack on not less than an hourly average basis. [PSD 04-01 Condition 1.7.3.1]

6.4.3.3.2.2. The CEMS will meet the requirements of Condition 6.4.3.4. [PSD 04-01 Condition 1.7.3.2]

6.4.3.4. Continuous Emission Monitoring Systems

6.4.3.4.1. CEMS for NO_x will satisfy the requirements contained in 40 CFR Part 60, Appendix B, Performance Specification 2 or 6 (as applicable) and 40 CFR

Part 60, Appendix F, Quality Assurance Procedures ((Section 6.1.1 for CGA requirements) [PSD 04-01 Condition 5.1]

6.4.3.4.2. The Relative Accuracy Test Audit required for each installed CEMS will be scheduled to occur during simultaneous test periods. [PSD 04-01 Condition 5.2]

6.4.3.5. Agrium will provide safe access and sampling ports for source testing of each exhaust stack after the final pollution control device:

6.4.3.5.1. Safe access will consist of permanently constructed platforms on the stacks [PSD 04-01 Condition 6.1]

6.4.3.5.2. The sampling ports will meet the requirement of CFR Part 60 Appendix A Method 1. [PSD 04-01 Condition 6.2]

6.4.3.5.3. Other arrangements may be acceptable if approved by Ecology prior to installation. [PSD 04-01 Condition 6.3]

6.4.3.6. Notification: Agrium will notify and report to BCAA as follows:

6.4.3.6.1. Notifications and reports will be in a written or electronic format approved by BCAA. [PSD 04-01 Condition 7.1]

6.4.3.6.2. The following notifications shall be submitted to Ecology and BCAA

6.4.3.6.2.1. Commencement of construction of the enhancements to the existing Plant 7 NO_x control system that are intended to be equivalent to BACT; in accordance with 40 CFR Part 60.7(a)(1), no later than 30 calendar days after such date. [PSD 04-01 Condition 7.2.3]

6.4.3.6.2.2. Initial startup of the enhancements to the existing Plant 7 NO_x control system that are intended to be equivalent to BACT; In accordance with 40 CFR Part 60.7(a)(3), no later than 15 calendar days after such date. [PSD 04-01 Condition 7.2.4]

6.4.3.6.2.3. Completion of the entry into the operation and maintenance manual of the items specified in Condition 6.4.3.7, within fifteen days after such entries were completed. [PSD 04-01 Condition 7.2.5]

6.4.3.6.2.4. The date on which the NO_x CEMS first demonstrated satisfactory performance pursuant to Condition 6.4.3.4.1, no later than 30 calendar days after such date. [PSD 04-01 Condition 7.2.6]

6.4.3.6.3. Reporting The following reports shall be submitted to BCAA

6.4.3.6.3.1. Report results of all initial compliance demonstrations pursuant to Condition 6.4.3.3.1.1 no later than 45 calendar days after completion of each respective source test. [PSD 04-01 Condition 7.3.1]

6.4.3.6.3.2. Continuing performance monitoring reports required under Condition 6.4.4.6.3.3 shall be submitted for each six-month period ending in June and December. [PSD 04-01 Condition 7.3.2]

- 6.4.3.6.3.2.1. Beginning with the six-month period that includes the final and effective date of PSD-04-01 permit [PSD 04-01 Condition 7.3.2.1]
- 6.4.3.6.3.2.2. Postmarked no later than one calendar month after the close of each respective six-month period [PSD 04-01 Condition 7.3.2.2]
- 6.4.3.6.3.2.3. In accordance with BCAA report format requirements. [PSD 04-01 Condition 7.3.2.3]
- 6.4.3.6.3.2.4. Another reporting schedule may be used if approved by Ecology and BCAA. [PSD 04-01 Condition 7.3.2.4]
- 6.4.3.6.3.3. Continuing performance monitoring reports will include but not necessarily be limited to the following:
 - 6.4.3.6.3.3.1. Certification by the responsible party for the facility that the relevant equipment was operated and maintained in accordance with the operational parameters and practices developed pursuant to Condition 6.4.3.7. [PSD 04-01 Condition 7.3.3.1]
 - 6.4.3.6.3.3.2. Pursuant to compliance under Conditions 6.4.3.1.1, 6.4.3.1.2, 6.4.3.1.3, and 6.4.3.1.4, NO_x emissions since the last report: [PSD 04-01 Condition 7.3.3.2]
 - 6.4.3.6.3.3.3. The duration and nature of any CEMS down-time excluding zero and span checks since the last report. [PSD 04-01 Condition 7.3.3.9]
 - 6.4.3.6.3.3.4. Results of any CEMS audits or accuracy checks since the last report [PSD 04-01 Condition 7.3.3.10]
- 6.4.3.6.3.4. Each occurrence of monitored NO_x emissions (Conditions 6.4.3.1.1, 6.4.3.1.2, 6.4.3.1.3, and 6.4.3.1.4) measured in excess of the limits shall be reported in writing to BCAA after the respective exceedance in accordance with WAC 173-400-107(3). Such reports shall as a minimum include:
 - 6.4.3.6.3.4.1. The time of the occurrence [PSD 04-01 Condition 7.3.4.1]
 - 6.4.3.6.3.4.2. Magnitude of divergence from the limit [PSD 04-01 Condition 7.3.4.2]
 - 6.4.3.6.3.4.3. The duration of the divergence [PSD 04-01 Condition 7.3.4.3]
 - 6.4.3.6.3.4.4. The probable cause [PSD 04-01 Condition 7.3.4.4]
 - 6.4.3.6.3.4.5. Corrective actions taken or planned [PSD 04-01 Condition 7.3.4.5]
 - 6.4.3.6.3.4.6. Any other agency contacted [PSD 04-01 Condition 7.3.4.6]

6.4.3.6.4. Record Keeping: Agrium will maintain monitoring, source test, CEM audit tests, and process records:

- 6.4.3.6.4.1. At the Kennewick facility [PSD 04-01 Condition 7.4.1]
- 6.4.3.6.4.2. For at least five years. [PSD 04-01 Condition 7.4.2]
- 6.4.3.6.4.3. Monitoring and process records that include time and duration of startups and shutdowns of Plant 7.[PSD 04-01 Condition 7.4.3]
- 6.4.3.6.4.4. Agrium will provide BCAA with monitoring and process records for any period within the five year archive within ten working days of request. [PSD 04-01 Condition 7.4.4]

6.4.3.7. Operation and maintenance (O&M) manual for the facility:

- 6.4.3.7.1. Agrium will identify operational parameters and practices for Plant 7 that constitute proper operation relative to compliance with the emission limitation conditions of this permit. [PSD 04-01 Condition 8.1]
- 6.4.3.7.2. Agrium will include these operational parameters and practices in the KFO O&M manual. As a minimum and to the extent they related to the emission limitations and operating requirements specified in the conditions of PSD-04-01 permit, these will include:
 - 6.4.3.7.2.1. Manufacturers' operating instructions and design specifications. [PSD 04-01 Condition 8.2.1]
 - 6.4.3.7.2.2. Normal operating parameters [PSD 04-01 Condition 8.2.2]
 - 6.4.3.7.2.3. Updates to reflect any modification of the equipment or its operating procedures [PSD 04-01 Condition 8.2.3]
- 6.4.3.7.3. Agrium will keep the operational parameters and practices in the O&M manual up to date to the extent that they relate to the emission limitations and operating requirements specified in the condition of PSD-04-01 permit [PSD 04-01 Condition 8.3]
- 6.4.3.7.4. Agrium will keep the O&M manual readily available at KFO for review by state, federal, and local agencies. [PSD 04-01 Condition 8.4]
- 6.4.3.7.5. Within thirty days of request from BCAA, Agrium shall submit the O&M manual to the requesting agency for approval of any elements relevant to the emission limitations specified in the conditions of PSD-04-01 permit. [PSD 04-01 Condition 8.5]
- 6.4.3.8. Subject to RCW 70.94.200, Agrium will permit the Environmental Protection Agency, state and local regulatory personnel access to the source upon request for the purposes of compliance assurance inspections. [PSD 04-01 Condition 10]
- 6.4.3.9. Nothing in this determination will be construed so as to relieve Agrium of its obligations under any state, local, or federal laws or regulations. [PSD 04-01 Condition 9]
- 6.4.3.10. Plant 7 currently is shut down as of the 2014 Renewal. Agrium must submit and receive approval for monitoring plant that complies with 40 CFR 64 Compliance Assurance Monitoring before this plant can resume production.**

6.5. Processes 5 and 8: Plants 3 and 10, Ammonium Nitrate Solution and Granulation Joy Scrubber Stacks

6.5.1. General PM Limit: Applicable Requirement 1 of 2: State (X)/Federal (X)

WAC 173-400-060

6.5.1.1. Description: The permittee shall not cause or permit emission of particulate material from any general process operation in excess of 0.23 g/dscm at standard conditions (0.1 gr/dscf) of exhaust gas. [WAC 173-400-060]

6.5.1.2. Test Method:

6.5.1.2.1. Test Method 1: Periodic monitoring of Joy scrubber operation.

6.5.1.2.2. Test Method 2: Reference Methods 1 through 5 in 40 CFR 60, Appendix A [WAC 173-400-060]

6.5.1.3. Monitoring: The following procedures shall constitute monitoring for purposes of compliance: [WAC 173-401-615(1)]

6.5.1.3.1. Monitoring Procedure 1: Periodic monitoring shall consist of maintaining proper operation of a Joy scrubber to control particulate emissions. Monitoring of scrubber operating conditions shall consist of controlling scrubber solution level and concentration.

6.5.1.3.2. Scrubber solution level shall be maintained above a minimum of 40% of the separation span of the scrubber tank level transmitter taps. Scrubber solution concentration shall be maintained below an ammonium nitrate concentration of 70%. The frequency of this monitoring shall be once each operating shift. Operator shall take necessary and appropriate corrective actions when the monitored parameters indicate that the scrubber is not properly functioning. Operator shall record monitored values and corrective actions in a log.

6.5.1.3.3. Monitoring Procedure 2: Reference methods will be performed while the plant is operating at maximum conditions. The initial source test shall be completed within 12 months from the date that the final permit is issued. After this initial test, the source test will be performed once each permitting cycle. Periodic monitoring parameters to be used in Monitoring Procedure 1 above shall be recorded simultaneously with the source test.

6.5.1.4. Record Keeping: Permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years. Support information includes all calibration and maintenance records and copies of all reports required by this permit. Support information shall also include all records from source tests. [WAC 173-401-615(2)(c)]

6.5.1.5. Reporting: Specific to this Applicable Requirement the permittee shall report according to section 1.13. [WAC 173-401-615(3); WAC 173-401-645(3)(d); WAC 173-400-107(3); WAC 173-400-107(4); WAC 173-400-107(5)]

6.5.2. General PM Limit: Applicable Requirement 2 of 2: State (X)/Federal (X)

PSD-04-01

6.5.2.1. Description

- 6.5.2.1.1. Hardening agent equivalent to Galoryl® GR 210-M4 shall be added to the granulator feed at a rate of not less than 75 milliliters per minute averaged over all operating hours on a calendar day basis. [PSD 04-01 Condition 4.1]
- 6.5.2.1.2. PM emissions from the ammonium nitrate (NH₄NO₃) granulator exhaust stack shall not exceed 0.011 gr/dscft on a 24-hour average basis[PSD 04-01 Condition 4.2]
- 6.5.2.1.3. PM emissions from the fluid bed cooler exhaust stack shall not exceed 0.085 gr/dscft an hour on a 24-hour average basis. [PSD 04-01 Condition 4.3]
- 6.5.2.1.4. The sum of PM emissions from the NH₄NH₃ granulator and fluid be cooler exhaust stacks shall not exceed 99.7 tons in any consecutive twelve month period. [PSD 04-01 Condition 4.4]
- 6.5.2.1.5. **Test Method** Compliance determination, demonstration, and monitoring: Compliance with Conditions 6.5.2.1.2 and 6.5.2.1.3 shall be determined by 40 CFR Part 60, Appendix A, Reference Method 5. [PSD 04-01 Condition 4.5]
- 6.5.2.1.6. **Monitoring:** Agrium will monitor continuing compliance with Conditions 6.5.2.1.2 and 6.5.2.1.3;
 - 6.5.2.1.6.1. Not less than once every twelve months from the final and effective date of PSD-04-01 permit will run a performance test. [PSD 04-01 Condition 4.6.1]
 - 6.5.2.1.6.1.1. If the results of two consecutive performance tests spaced not less than ten months apart are each not greater than 80% of the respective limit, the next set of performance test may be delayed for not more than sixty months. [PSD 04-01 Condition 4.6.1.1]
 - 6.5.2.1.6.1.2. A sixty month performance test cycle may be continued until one or more test results exceeds 80% of its respective limit. After such event, the twelve month performance test cycle (Condition 6.5.2.1.6.1) will be reinstated until/unless performance test results satisfy Condition 6.5.2.1.6.1.1. [PSD 04-01 Condition 4.6.1.2]
 - 6.5.2.1.6.2. For the duration of the performance test, Plant 10 shall be operated at not less than 80% of its design capacity. [PSD 04-01 Condition 4.6.2]
 - 6.5.2.1.6.3. Compliance will be monitored by:
 - 6.5.2.1.6.3.1. 40 CFR Part 60, Appendix A, Reference Method 5 [PSD 04-01 Condition 4.6.3.1]

- 6.5.2.1.6.3.2. An equivalent mass emission rate calculation method may be used if approved in advance by BCAA. [PSD 04-01 Condition 4.6.3.2]
- 6.5.2.1.6.4. Agrium will submit a test plan to BCAA for approval at least 30 days prior to initial performance testing. [PSD 04-01 Condition 4.6.4]
- 6.5.2.1.7. Record Keeping** Agrium will monitor continuing compliance with Condition 6.5.2.1.1:
 - 6.5.2.1.7.1. Beginning immediately upon the final and effective date of PSD-04-01 permit PSD 04-01 Condition 4.7.1]
 - 6.5.2.1.7.2. By maintaining daily records of hardening agent use and granular ammonium nitrate production from Plant 10 [PSD 04-01 Condition 4.7.2]
- 6.5.2.1.8.** Agrium will monitor continuing compliance with Condition 6.5.2.1.4:
 - 6.5.2.1.8.1. Beginning with the conclusion of the twelfth month after the final and effective date of PSD-04-01 permit
 - 6.5.2.1.8.2. Determine the arithmetic mean of PM emissions on a pound per hour basis from the respective source test results performed within each twelve consecutive month period (or from the most recent sixty-month test cycle result, if applicable) on the NH_4NO_3 granulator and fluid bed cooler exhaust stack pursuant to Condition 6.5.2.1.6.
 - 6.5.2.1.8.3. Multiply the sum of the values determined pursuant to Condition 6.5.2.1.8.2 by the number of Plant 10 operating hours over the most recent twelve consecutive months.
 - 6.5.2.1.8.4. An equivalent mass emission rate calculation method may be used if approved in advance by BCAA.
- 6.5.2.2. Agrium will provide safe access and sampling ports for source testing of each exhaust stack after the final pollution control device:
 - 6.5.2.2.1. Safe access will consist of permanently constructed platforms on the stacks [PSD 04-01 Condition 6.1]
 - 6.5.2.2.2. The sampling ports will meet the requirement of CFR Part 60 Appendix A Method 1. [PSD 04-01 Condition 6.2]
 - 6.5.2.2.3. Other arrangements may be acceptable if approved by Ecology prior to installation. [PSD 04-01 Condition 6.3]
- 6.5.2.3. Notification:** Agrium will notify and report to BCAA as follows:
 - 6.5.2.3.1. Notifications and reports will be in a written or electronic format approved by BCAA. [PSD 04-01 Condition 7.1]
 - 6.5.2.3.2. The following notifications shall be submitted to Ecology and BCAA
 - 6.5.2.3.2.1. Completion of the entry into the operation and maintenance manual of the items specified in Condition 6.5.2.4, within fifteen days after such entries were completed. [PSD 04-01 Condition 7.2.5]

6.5.2.3.2.2. Any change in the brand of hardening agent to be used in Plant 10, no later than 30 calendar days after the date of purchase of the new brand. [PSD 04-01 Condition 7.2.7]

6.5.2.4. Reporting: The following reports shall be submitted to BCAA

- 6.5.2.4.1. Report results of all initial compliance demonstrations no later than 45 calendar days after completion of each respective source test. [PSD 04-01 Condition 7.3.1]
- 6.5.2.4.2. Continuing performance monitoring reports required under Condition 6.5.2.3.3 shall be submitted for each six-month period ending in June and December. [PSD 04-01 Condition 7.3.2]
 - 6.5.2.4.2.1. Beginning with the six-month period that includes the final and effective date of PSD-04-01 permit. [PSD 04-01 Condition 7.3.2.1]
 - 6.5.2.4.2.2. Postmarked not later than one calendar month after the close of each respective six-month period. [PSD 04-01 Condition 7.3.2.2]
 - 6.5.2.4.2.3. In accordance with BCAA report format requirements. [PSD 04-01 Condition 7.3.2.3]
 - 6.5.2.4.2.4. Another reporting schedule may be used if approved by Ecology and BCAA. [PSD 04-01 Condition 7.3.2.4]
- 6.5.2.4.3. Continuing performance monitoring reports will include but not necessarily be limited to the following:
 - 6.5.2.4.3.1. Certification by the responsible party for the facility that the relevant equipment was operated and maintained in accordance with the operational parameters and practices developed pursuant to Condition 6.5.2.5. [PSD 04-01 Condition 7.3.3.1]
 - 6.5.2.4.3.2. Pursuant to compliance under Conditions 6.5.2.1.1 hardening agent use in plant 10 since the last report: [PSD 04-01 Condition 7.3.3.6]
 - 6.5.2.4.3.3. Pursuant to compliance under Condition 6.5.2.1.2 and 1.3, results of any source tests for PM since the last report. [PSD 04-01 Condition 7.3.3.7]
 - 6.5.2.4.3.4. Pursuant to compliance under Condition 6.5.2.1.4, PM emission from Plant 10 since the last report [PSD 04-01 Condition 7.3.3.8]
- 6.5.2.4.4. Each occurrence of monitored NO_x emissions (Conditions 6.5.2.1.1, 6.5.2.1.2, and 6.5.2.1.4) measured in excess of the limits shall be reported in writing to BCAA after the respective exceedance in accordance with WAC 173-400-107(3). Such reports shall as a minimum include:
 - 6.5.2.4.4.1. The time of the occurrence [PSD 04-01 Condition 7.3.4.1]
 - 6.5.2.4.4.2. Magnitude of divergence from the limit [PSD 04-01 Condition 7.3.4.2]
 - 6.5.2.4.4.3. The duration of the divergence [PSD 04-01 Condition 7.3.4.3]
 - 6.5.2.4.4.4. The probable cause [PSD 04-01 Condition 7.3.4.4]
 - 6.5.2.4.4.5. Corrective actions taken or planned [PSD 04-01 Condition 7.3.4.5]

6.5.2.4.4.6. Any other agency contacted [PSD 04-01 Condition 7.3.4.6]

6.5.2.4.5. Record Keeping: Agrium will maintain monitoring, source test, CEM audit tests, and process records:

6.5.2.4.5.1. At the Kennewick facility [PSD 04-01 Condition 7.4.1]

6.5.2.4.5.2. For at least five years. [PSD 04-01 Condition 7.4.2]

6.5.2.4.5.3. Monitoring and process records that include time and duration of startups and shutdowns of Plant 9 [PSD 04-01 Condition 7.4.3]

6.5.2.4.5.4. Agrium will provide BCAA with monitoring and process records for any period within the five year archive within ten working days of request. [PSD 04-01 Condition 7.4.4]

6.5.2.5. Operation and maintenance (O&M) manual for the facility:

6.5.2.5.1. Agrium will identify operational parameters and practices for Plant 10 that constitute proper operation relative to compliance with the emission limitation conditions of this permit. [PSD 04-01 Condition 8.1]

6.5.2.5.2. Agrium will include these operational parameters and practices in the KFO O&M manual. As a minimum and to the extent they related to the emission limitations and operating requirements specified in the conditions of PSD-04-01 permit, these will include:

6.5.2.5.2.1. Manufacturers' operating instructions and design specifications [PSD 04-01 Condition 8.2.1]

6.5.2.5.2.2. Normal operating parameters [PSD 04-01 Condition 8.2.2]

6.5.2.5.2.3. Updates to reflect any modification of the equipment or its operating procedures [PSD 04-01 Condition 8.2.3]

6.5.2.5.3. Agrium will keep the operational parameters and practices in the O&M manual up to date to the extent that they relate to the emission limitations and operating requirements specified in the conditions of PSD-04-01 permit [PSD 04-01 Condition 8.3]

6.5.2.5.4. Agrium will keep the O&M manual readily available at KFO for review by state, federal, and local agencies. [PSD 04-01 Condition 8.4]

6.5.2.5.5. Within thirty days of request from BCAA, Agrium shall submit the O&M manual to the requesting agency for approval of any elements relevant to the emission limitations specified in the conditions of PSD-04-01 permit. [PSD 04-01 Condition 8.5]

6.5.2.6. Nothing in this determination will be construed so as to relieve Agrium of its obligations under any state, local, or federal laws or regulations. [PSD 04-01 Condition 9]

6.5.2.7. Subject to RCW 70.94.200, Agrium will permit the Environmental Protection Agency, state and local regulatory personnel access to the source upon request for the purposes of compliance assurance inspections. [PSD 04-01 Condition 10]

6.5.2.8. The Granulation process for plants Plant 3 and 10 currently are shut down as of the 2014 Renewal. Agrium must submit and receive approval for monitoring

plant that complies with 40 CFR 64 Compliance Assurance Monitoring before this plant can resume production..

6.6. Process 5B: Plant 3, Granulated Ammonium Nitrate Drum Cooler

6.6.1. General PM Limit: Applicable Requirement 1 of 1: State (X)/Federal (X)

WAC 173-400-060

6.6.1.1. Description: The permittee shall not cause or permit emission of particulate material from any general process operation in excess of 0.23 g/dscm (0.1 grain/dscf) at standard conditions of exhaust gas. [WAC 173-400-060]

6.6.1.2. Test Method:

6.6.1.2.1. Test Method 1: Periodic monitoring of scrubber operations.

6.6.1.2.2. Test Method 2: Reference Methods 1 through 5 in 40 CFR 60, Appendix A [WAC 173-400-060]

6.6.1.3. Monitoring: The following procedures shall constitute monitoring for purposes of compliance: [WAC 173-401-615(1)]

6.6.1.3.1. Monitoring Procedure 1: Because this process is equipped with wet scrubbing of PM emissions, periodic monitoring shall consist of maintaining proper water flow to the wet scrubber and maintaining scrubber solution concentration below an ammonium nitrate concentration of 70%

6.6.1.3.2. The operator shall check water flow, scrubber solution concentration, and observe for visible emissions periodically at least once during each operational shift. The operator shall take necessary and appropriate corrective actions when the water spray is not properly functioning. These observations and corrective actions shall be recorded in an operator log.

6.6.1.3.3. Monitoring Procedure 2: Reference methods will be performed while plant is operating at maximum production rates. The initial source test shall be completed within 12 months from the date that the final permit is issued. After this initial test, the source test will be performed once each permitting cycle. Periodic monitoring parameters to be used in section a) above shall be recorded simultaneously with the source test.

6.6.1.4. Record Keeping: Permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years. Support information includes all calibration and maintenance records and all original strip-chart recordings from continuous monitoring instrumentation, and copies of all reports required by this permit. Support information shall also include all records from source tests. [WAC 173-401-615(2)(c)]

6.6.1.5. Reporting: Specific to this Applicable Requirement the permittee shall report according to section 1.13. [WAC 173-401-615(3); WAC 173-401-645(3)(d); WAC 173-400-107(3); WAC 173-400-107(4); WAC 173-400-107(5)]

6.7. Process 6 and 7: Plants 8 and 10, Ammonium Nitrate Neutralizers

6.7.1. General PM Limit: Applicable Requirement 1 of 1: State (X)/Federal (X)

WAC 173-400-060

6.7.1.1. Description: The permittee shall not cause or permit emission of particulate material from any general process operation in excess of 0.23 g/dscm (0.1 grain/dscf) at standard conditions of exhaust gas. [WAC 173-400-060]

6.7.1.2. Test Method: Periodic monitoring of pH in the reaction solution.

6.7.1.3. Monitoring:

6.7.1.3.1. The following procedures shall constitute monitoring for purposes of compliance: [WAC 173-401-615(1)]

6.7.1.3.2. Periodic monitoring shall consist of a continuous parametric monitoring system (CPMS) for pH in the reaction solution. The pH shall be maintained between 2.0 and 6.6. However, due to the dynamic nature of neutralizer operation, high and low pH "swing" readings lasting one to five minutes do not constitute a violation of the monitoring limit. A pH excursion does not occur until the pH exceeds the range limits for more than five minutes. Operators shall take necessary and appropriate corrective actions according to standard operating procedures when the pH CPMS indicates that the neutralizer is not properly functioning. Observations of malfunction and corrective actions shall be recorded in an operator log.

6.7.1.4. Record Keeping: Permittee shall retain records of all required monitoring data and support information for a period of at least five years. Support information includes all calibration and maintenance records and copies of all reports required by this permit. [WAC 173-401-615(2)(c)]

6.7.1.5. Reporting: Specific to this Applicable Requirement the permittee shall report according to section 1.13. [WAC 173-401-615(3); WAC 173-401-645(3)(d); WAC 173-400-107(3); WAC 173-400-107(4); WAC 173-400-107(5)]

6.8. Process 8A: Plant 10 Granulated Fluid Bed Product Cooler Stack

6.8.1. General PM Limit: Applicable Requirement 1 of 1: State (X)/Federal (X)

WAC 173-400-060

6.8.1.1. Description: No person shall cause or permit emission of particulate material from any general process operation in excess of 0.23 g/dscm at standard conditions (0.1 gr/dscf) of exhaust gas [WAC 173-400-060]

6.8.1.2.. Test Method:

- 6.8.1.2.1. Test Method 1: Periodic monitoring of airflow pressure differential across the fluid bed cooler chamber.
- 6.8.1.2.2. Test Method 2: Reference Methods 1 through 5 in 40 CFR 60, Appendix A [WAC 173-400-060]
- 6.8.1.3. Monitoring:** The following procedures shall constitute monitoring for purposes of compliance: [WAC 173-401-615(1)]
 - 6.8.1.3.1. Procedure 1: Periodic monitoring shall consist of maintaining proper airflow pressure differential across the fluid bed cooler chamber.

When this process is being operated the operator shall in each shift note function of the air flow system including visual observation of the system and air pressures from the product entry point to product exit point of the cooler bed. These observations shall be recorded in an operator log.
 - 6.8.1.3.2. Procedure 2: Reference methods will be performed while plant is operating at maximum production rates. The initial source test shall be completed within 12 months from the date that the final permit is issued. After this initial test, the source test will be performed once each permitting cycle. Periodic monitoring parameters to be used in section a) above shall be recorded simultaneously with the source test.
- 6.8.1.4. Record Keeping:** Permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years. Support information includes all calibration and maintenance records and copies of all reports required by this permit. Support information shall also include all records from source tests. [WAC 173-401-615(2)(c)]
- 6.8.1.5. Reporting:** Specific to this Applicable Requirement the permittee shall report according to section 1.13. [WAC 173-401-615(3); WAC 173-401-645(3)(d); WAC 173-400-107(3); WAC 173-400-107(4); WAC 173-400-107(5)]

6.9. Process 11: Solid Urea Storage and Handling

6.9.1. General PM Limit: Applicable Requirement 1 of 1: State (X)/Federal (X)

WAC 173-400-060

- 6.9.1.1. Description:** No person shall cause or permit emission of particulate material from any general process operation in excess of 0.23 g/dscm (0.1 grain/dscf) at standard conditions of exhaust gas. [WAC 173-400-060]
- 6.9.1.2. Test Method:** Periodic monitoring of baghouse operation.
- 6.9.1.3. Monitoring:** The following procedures shall constitute monitoring for purposes of compliance: [WAC 173-401-615(1)]
 - 6.9.1.3.1. This emission point requires the use of a properly maintained baghouse to meet the Applicable Requirement. Periodic monitoring shall consist of an

observation, each shift, of opacity from the baghouse outlet and any leakage from the access door on the baghouse.

6.9.1.3.2. The operator shall take necessary and appropriate corrective actions when it is observed that the baghouse is not properly functioning. These observations and corrective actions taken shall be recorded in an operator log.

6.9.1.4. Record Keeping: Permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years. Support information shall include all operation and maintenance records. [WAC 173-401-615(2)(c)]

6.9.1.5. Reporting: Specific to this Applicable Requirement the permittee shall report according to section 1.13. [WAC 173-401-615(3); WAC 173-401-645(3)(d); WAC 173-400-107(3); WAC 173-400-107(4); WAC 173-400-107(5)]

6.10. Process 12: Urea Loading

6.10.1. General PM Limit: Applicable Requirement 1 of 1: State (X)/Federal (X)

WAC 173-400-060

6.10.1.1. Description: No person shall cause or permit emission of particulate material from any general process operation in excess of 0.23 g/dscm (0.1 grain/dscf) at standard conditions of exhaust gas.

6.10.1.2. Test Method: Periodic monitoring of baghouse operation.

6.10.1.3. Monitoring: The following procedures shall constitute monitoring for purposes of compliance: [WAC 173-401-615(1)]

6.10.1.3.1. This emission point requires the use of a properly maintained baghouse to meet the Applicable Requirement. Periodic monitoring shall consist of an observation, each shift, of opacity from the baghouse outlet and any leakage from the access door on the baghouse.

6.10.1.3.2. The operator shall take necessary and appropriate corrective actions when it is observed that the baghouse is not properly functioning. These observations and corrective actions taken shall be recorded in an operator log.

6.10.1.4. Record Keeping: Permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years. Support information shall include all operation and maintenance records. [WAC 173-401-615(2)(c)]

6.10.1.5. Reporting: Specific to this Applicable Requirement the permittee shall report according to section 1.13. [WAC 173-401-615(3); WAC 173-401-645(3)(d); WAC 173-400-107(3); WAC 173-400-107(4); WAC 173-400-107(5)]

6.11. Process 13: Boiler F-521 (CB-3), Process 15: Boiler F-513 (CB-2), and Process 16: Boiler F-502 (Ames)

6.11.1. Sulfur Dioxide Limit: Applicable Requirement 1 of 2: State (X)/Federal (X)

WAC 173-400-040(7)

- 6.11.1.1. Description:** Sulfur dioxide. No person shall cause or permit the emission of a gas containing sulfur dioxide from any emissions unit in excess of 1000 ppm of sulfur dioxide on a dry basis, corrected to seven percent oxygen for combustion sources, and based on the average of any period of 60 consecutive minutes.
- 6.11.1.2. Test Method:** No test method required, monitoring, record keeping and reporting only.
- 6.11.1.3. Monitoring:**
- 6.11.1.3.1. Permittee shall burn natural gas only. Use of natural gas as firing fuel will meet Applicable Requirement for SO₂ emissions. No analysis will be required. [WAC 173-401-615(1)(b)]
 - 6.11.1.3.2. Compliance shall be assured via certification by the permittee's responsible official that the only fuel burned in this process during the reporting period was natural gas. Such certification shall constitute monitoring for purposes of compliance [WAC 173-401-615(1)]
- 6.11.1.4. Record Keeping:** Maintain compliance documents for a period of five (5) years. [WAC 173-401-615(2)(c)]
- 6.11.1.5. Reporting:**
- 6.11.1.5.1. Specific to this Applicable Requirement the permittee shall report according to section 1.13. [WAC 173-401-615(3); WAC 173-401-645(3)(d); WAC 173-400-107(3); WAC 173-400-107(4); WAC 173-400-107(5)]
 - 6.11.1.5.2. As part of the 6-month monitoring report required by Condition 1.13 and as part of the annual compliance certification report required by Condition 3.3, the permittee shall report that natural gas was the sole source of fuel burned in this process during the specified reporting period. [WAC 173-401-615(3); WAC 173-401-630(5)(a)]

6.11.2. General PM Limit: Applicable Requirement 2 of 2: State (X)/Federal (X)

WAC 173-400-050(1)

- 6.11.2.1. Description:** Emissions of particulate matter from combustion emissions units shall not exceed 0.23 g/dscm (0.1 grain/dscf) at standard conditions. [WAC 173-400-060]
- 6.11.2.2. Test Method:**
- 6.11.2.2.1. Test Method 1: Qualitative Assessment
 - 6.11.2.2.2. Test Method 2: 40 CFR 60 Appendix A Method 9 (if required)

- 6.11.2.3. Monitoring:** See the opacity monitoring requirements specified in Condition 5.1, Applicable Requirement 1 (page 16). [WAC 173-401-615(1)]
- 6.11.2.4. Record Keeping:** See the record keeping requirements specified in Condition 5.1, Applicable Requirement 1 (page 16). [WAC 173-401-615(2)]
- 6.11.2.5. Reporting:** See the reporting requirements specified in Condition 5.1, Applicable Requirement 1 (page 16). [WAC 173-401-615(3)]

6.12. Process 19: Plant 8 UAN-32 Mixer

6.12.1. General PM Limit: Applicable Requirement 1 of 1: State (X)/Federal (X)**WAC 173-400-060**

- 6.12.1.1. Description:** No person shall cause or permit emission of particulate material from any general process operation in excess of 0.23 g/dscm (0.1 grain/dscf) at standard conditions of exhaust gas.
- 6.12.1.2. Test Method:**
 - 6.12.1.2.1. Test Method 1: Qualitative Assessment
 - 6.12.1.2.2. Test Method 2: 40 CFR 60 Appendix A Method 9 (if required)
- 6.12.1.3. Monitoring:** See the opacity monitoring requirements specified in Condition 5.1, Applicable Requirement 1 (page 16). [WAC 173-401-615(1)]
- 6.12.1.4. Record Keeping:** See the record keeping requirements specified in Condition 5.1, Applicable Requirement 1. [WAC 173-401-615(2)]
- 6.12.1.5. Reporting:** See the reporting requirements specified in Condition 5.1, Applicable Requirement 1. [WAC 173-401-615(3)]

6.13. Process 19A: Urea Transfer to UAN-32 Mixer

6.13.1. General PM Limit: Applicable Requirement 1 of 1: State (X)/Federal (X)**WAC 173-400-060**

- 6.13.1.1. Description:** No person shall cause or permit emission of particulate material from any general process operation in excess of 0.23 g/dscm (0.1 grain/dscf) at standard conditions of exhaust gas. [WAC 173-400-060]
- 6.13.1.2. Test Method:** Periodic monitoring of baghouse operation.
- 6.13.1.3. Monitoring:**
 - 6.13.1.3.1. The following procedures shall constitute monitoring for purposes of compliance: [WAC 173-401-615(1)]
 - 6.13.1.3.2. This emission point requires the use of a properly maintained baghouse to meet the Applicable Requirement. Periodic monitoring shall consist of an

observation, each shift, of opacity from the baghouse outlet and any leakage from the access door on the baghouse.

6.13.1.3.3. The operator shall take necessary and appropriate corrective actions when it is observed that the baghouse is not properly functioning. These observations and corrective actions taken shall be recorded in an operator log.

6.13.1.4. Record Keeping: Permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years. Support information includes maintenance records and copies of all reports required by this permit. [WAC 173-401-615(2)(c)]

6.13.1.5. Reporting: Specific to this Applicable Requirement the permittee shall report according to section 1.13. [WAC 173-401-615(3); WAC 173-401-645(3)(d); WAC 173-400-107(3); WAC 173-400-107(4); WAC 173-400-107(5)]

6.14. Process 20: Plant 11 UAN-32 Mixer

6.14.1. General PM Limit

Applicable Requirement 1 of 1: State (X)/Federal (X)

WAC 173-400-060

6.14.1.1. Description: No person shall cause or permit emission of particulate material from any general process operation in excess of 0.23 g/dscm (0.1 grain/dscf) at standard conditions of exhaust gas. [WAC 173-400-060]

6.14.1.2. Test Method:

6.14.1.2.1. Test Method 1: Qualitative Assessment

6.14.1.2.2. Test Method 2: 40 CFR 60 Appendix A Method 9 (if required)

6.14.1.3. Monitoring: See the opacity monitoring requirements specified in Condition 5.1, Applicable Requirement 1 (page 16). [WAC 173-401-615(1)]

6.14.1.4. Record Keeping: See the record keeping requirements specified in Condition 5.1, Applicable Requirement 1. [WAC 173-401-615(2)]

6.14.1.5. Reporting: See the reporting requirements specified in Condition 5.1, Applicable Requirement 1. [WAC 173-401-615(3)]

6.15. Process 21: Plant 8 Calcium Ammonium Nitrate 17% N Solution (CAN-17) Production Mixer Stack

6.15.1. General PM Limit: Applicable Requirement 1 of 2: State (X)/Federal (X)

WAC 173-400-060

- 6.15.1.1. Description:** No person shall cause or permit emission of particulate material from any general process operation in excess of 0.23 g/dscm (0.1 grain/dscf) at standard conditions of exhaust gas.
- 6.15.1.2. Test Method:** Periodic monitoring of scrubber water flow.
- 6.15.1.3. Monitoring:** The following procedures shall constitute monitoring for purposes of compliance: [WAC 173-401-615(1)]
- 6.15.1.3.1. Because this process is equipped for wet scrubbing of PM and NO_x emissions, periodic monitoring shall consist of maintaining proper water flow to the wet scrubber. Operator shall check water flow and observe for visible emissions periodically at least once during each operational shift.
- 6.15.1.3.2. The operator shall take necessary and appropriate corrective actions when it is observed that the scrubber is not properly functioning. These observations and corrective actions taken shall be recorded in an operator log.
- 6.15.1.4. Record Keeping:** Permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years. Support information includes maintenance records and copies of all reports required by this permit. [WAC 173-401-615(2)(c)]
- 6.15.1.5. Reporting:** Specific to this Applicable Requirement the permittee shall report according to section 1.13. [WAC 173-401-615(3); WAC 173-401-645(3)(d); WAC 173-400-107(3); WAC 173-400-107(4); WAC 173-400-107(5)]

6.15.2. NO_x Emissions from Plant 8: Applicable Requirement 2 of 2: State (X)/Federal (X) PSD-04-01

6.15.2.1. Description: NO_x Emissions from Plant 8:

- 6.15.2.1.1. Shall not exceed 1.1 lb NO_x/T_{CAN-17} on a calendar day average basis. [PSD 04-01 Condition 2.1]
- 6.15.2.1.2. Only HNO₃ from Plant 9 shall be used [PSD 04-01 Condition 2.2; PSD 04-01 Condition 7.3.3.3]
- 6.15.2.1.3. Urea [chemical formula CO(NH₂)₂] shall be added to the limestone-HNO₃ mixing step of the CAN-17 production process at a rate of not less than 37 pounds urea per ton CAN-17 on a calendar day average basis. [PSD 04-01 Condition 2.3]
- 6.15.2.1.4. Test Method** Compliance determination, demonstration, and monitoring:
- 6.15.2.1.4.1. Compliance for Condition 6.15.2.1.1 shall be determined in accordance with 40 CFR Part 60.74 (Test methods and procedures). Method 7E may be used for determining compliance in accordance with EPA Jun 8, 2006 approval. [PSD 04-01 Condition 2.4.1]
- 6.15.2.1.4.2. Within 180 Plant 8 operating days after the final effective date of PSD-04-01 permit, Agrium will conduct an initial performance test for Condition 6.15.2 .1.1. [PSD 04-01 Condition 2.4.2]

- 6.15.2.1.4.2.1. During the performance test, Plant 8 shall run at not less than 80% of the CAN-17 production capacity.[PSD 04-01 Condition 2.4.2.1]
- 6.15.2.1.4.2.2. Agrium will submit a test plan to BCAA for approval at least 30 days prior to performance testing.[PSD 04-01 Condition 2.4.2.2]
- 6.15.2.1.4.3. Monitoring:** Not less than once every 60 months after the initial performance test, Agrium shall conduct a performance test under the terms of Conditions 6.15.2.1.4.2.1 and 6.15.2.1.4.2.2 [PSD 04-01 Condition 2.4.3]
- 6.15.2.1.4.4. Agrium will provide safe access and sampling ports for source testing of each exhaust stack after the final pollution control device:
 - 6.15.2.1.4.4.1. Safe access will consist of permanently constructed platforms on the stacks. [PSD 04-01 Condition 6.1]
 - 6.15.2.1.4.4.2. The sampling ports will meet the requirement of CFR Part 60 Appendix A Method 1. [PSD 04-01 Condition 6.3]
 - 6.15.2.1.4.4.3. Other arrangements may be acceptable if approved by Ecology prior to installation. [PSD 04-01 Condition 6.2]
- 6.15.2.1.4.5. **Record Keeping** Agrium shall monitor compliance with Conditions 6.15.2.1.2 and 6.15.2.1.3 by maintaining appropriate logs and urea use records. [PSD 04-01 Condition 2.4.4]

6.15.2.2. Reporting: Agrium will notify and report to BCAA as follows:

- 6.15.2.2.1. Notifications and reports will be in a written or electronic format approved by BCAA. [PSD 04-01 Condition 7.1]

6.15.2.2.2. The following reports shall be submitted to BCAA

- 6.15.2.2.2.1. Report results of all initial compliance demonstrations no later than 45 calendar days after completion of each respective source test. [PSD 04-01 Condition 7.3.1]
- 6.15.2.2.2.2. Continuing performance monitoring reports shall be submitted for each six-month period ending in June and December. [PSD 04-01 Condition 7.3.2]
 - 6.15.2.2.2.2.1. Beginning with the six-month period that includes the final and effective date of PSD-04-01 permit [PSD 04-01 Condition 7.3.2.1]
 - 6.15.2.2.2.2.2. Postmarked not later than 45 days after the close of each respective six-month period [PSD 04-01 Condition 7.3.2.2]

- 6.15.2.2.2.3. In accordance with BCAA report format requirements. [PSD 04-01 Condition 7.3.2.3]
- 6.15.2.2.2.4. Another reporting schedule may be used if approved by Ecology and BCAA. [PSD 04-01 Condition 7.3.2.4]
- 6.15.2.2.2.3. Continuing performance monitoring reports will include but not necessarily be limited to the following:
 - 6.15.2.2.2.3.1. Certification by the responsible party for the facility that the relevant equipment was operated and maintained in accordance with the operational parameters and practices developed pursuant to Condition 6.15.2.3. [PSD 04-01 Condition 7.3.3.1]
 - 6.15.2.2.2.3.2. Pursuant to compliance under Conditions 6.15.2.1.1 NO_x emissions since the last report: [PSD 04-01 Condition 7.3.3.2]
 - 6.15.2.2.2.3.3. Pursuant to compliance under Condition 6.15.2.1.2, certification from the responsible party for the facility that only HNO₃ from Plant 9 was used to produce CAN-17 in Plant 8 since the last report. [PSD 04-01 Condition 7.3.3.3]
 - 6.15.2.2.2.3.4. Pursuant to compliance under Condition 6.15.2.1.3, Urea use in Plant 8 since the last report [PSD 04-01 Condition 7.3.3.4]
- 6.15.2.2.2.4. Each occurrence of monitored NO_x emissions (Conditions 6.15.2.1.1, 6.15.2.1.2, and 6.15.2.1.4) measured in excess of the limits shall be reported in writing to BCAA after the respective exceedance in accordance with WAC 173-400-107(3). Such reports shall as a minimum include:
 - 6.15.2.2.2.4.1. The time of the occurrence [PSD 04-01 Condition 7.3.4.1]
 - 6.15.2.2.2.4.2. Magnitude of divergence from the limit [PSD 04-01 Condition 7.3.4.2]
 - 6.15.2.2.2.4.3. The duration of the divergence [PSD 04-01 Condition 7.3.4.3]
 - 6.15.2.2.2.4.4. The probable cause [PSD 04-01 Condition 7.3.4.4]
 - 6.15.2.2.2.4.5. Corrective actions taken or planned [PSD 04-01 Condition 7.3.4.5]
 - 6.15.2.2.2.4.6. Any other agency contacted [PSD 04-01 Condition 7.3.4.6]

6.15.2.2.3. Record Keeping: Agrium will maintain monitoring, source test, CEM audit tests, and process records:

- 6.15.2.2.3.1. At the Kennewick facility [PSD 04-01 Condition 7.4.1]
- 6.15.2.2.3.2. For at least five years. [PSD 04-01 Condition 7.4.2]
- 6.15.2.2.3.3. Monitoring and process records that include time and duration of startups and shutdowns of Plant 9 [PSD 04-01 Condition 7.4.3]

- 6.15.2.2.3.4. Agrium will provide BCAA with monitoring and process records for any period within the five year archive within ten working days of request. [PSD 04-01 Condition 7.4.4]

6.15.2.3. Operation and maintenance (O&M) manual for the facility:

- 6.15.2.3.1. Agrium will identify operational parameters and practices for Plant 8 that constitute proper operation relative to compliance with the emission limitation conditions of this permit. [PSD 04-01 Condition 8.1]
- 6.15.2.3.2. Agrium will include these operational parameters and practices in the KFO O&M manual. As a minimum and to the extent they related to the emission limitations and operating requirements specified in the conditions of PSD-04-01 permit, these will include:
 - 6.15.2.3.2.1. Manufacturers' operating instructions and design specifications [PSD 04-01 Condition 8.2.1]
 - 6.15.2.3.2.2. Normal operating parameters [PSD 04-01 Condition 8.2.2]
 - 6.15.2.3.2.3. Updates to reflect any modification of the equipment or its operating procedures [PSD 04-01 Condition 8.2.3]
- 6.15.2.3.3. Agrium will keep the operational parameters and practices in the O&M manual up to date to the extent that they relate to the emission limitations and operating requirements specified in the condition of PSD-04-01 permit [PSD 04-01 Condition 8.3]
- 6.15.2.3.4. Agrium will keep the O&M manual readily available at KFO for review by state, federal, and local agencies. [PSD 04-01 Condition 8.4]
- 6.15.2.3.5. Within thirty days of request from BCAA, Agrium shall submit the O&M manual to the requesting agency for approval of any elements relevant to the emission limitations specified in the conditions of PSD-04-01 permit. [PSD 04-01 Condition 8.5]
- 6.15.2.4. Nothing in this determination will be construed so as to relieve Agrium of its obligations under any state, local, or federal laws or regulations. [PSD 04-01 Condition 9]
- 6.15.2.5. Subject to RCW 70.94.200, Agrium will permit the Environmental Protection Agency, state and local regulatory personnel access to the source upon request for the purposes of compliance assurance inspections. [PSD 04-01 Condition 10]

6.16. Process 22: Plant 8 CAN-17 Calcium Carbonate Transfer Baghouse Stack

6.16.1. General PM Limit: Applicable Requirement 1 of 1: State (X)/Federal (X)

WAC 173-400-060

- 6.16.1.1. **Description:** No person shall cause or permit emission of particulate material from any general process operation in excess of 0.23 g/dscm (0.1 grain/dscf) at standard conditions of exhaust gas. [WAC 173-400-060]
- 6.16.1.2. **Test Method:** Periodic monitoring of baghouse operation.

- 6.16.1.3. Monitoring:** The following procedures shall constitute monitoring for purposes of compliance: [WAC 173-401-615(1)]
- 6.16.1.3.1. This emission point requires the use of a properly maintained baghouse to meet the Applicable Requirement. Periodic monitoring shall consist of an observation, each shift, of opacity from the baghouse outlet and any leakage from the access door on the baghouse.
 - 6.16.1.3.2. The operator shall take necessary and appropriate corrective actions when it is observed that the baghouse is not properly functioning. These observations and corrective actions taken shall be recorded in an operator log.
- 6.16.1.4. Record Keeping:** Permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years. Support information shall include all operation and maintenance records. [WAC 173-401-615(2)(c)]
- 6.16.1.5. Reporting:** Specific to this Applicable Requirement the permittee shall report according to section 1.13. [WAC 173-401-615(3); WAC 173-401-645(3)(d); WAC 173-400-107(3); WAC 173-400-107(4); WAC 173-400-107(5)]

6.17. Process 24: Emergency Flare Stack

6.17.1. Sulfur Dioxide Limit: Applicable Requirement 1 of 4: State (X)/Federal (X)

WAC 173-400-040(7)

- 6.17.1.1. Description:** Sulfur dioxide. No person shall cause or permit the emission of a gas containing sulfur dioxide from any emissions unit in excess of 1000 ppm of sulfur dioxide on a dry basis, corrected to seven percent oxygen for combustion sources, and based on the average of any period of 60 consecutive minutes. [BCAA OA 2014-0004 Condition 5.1]
- 6.17.1.2. Test Method:** No test method required, monitoring, record keeping and reporting only.
- 6.17.1.3. Monitoring:**
- 6.17.1.3.1. Permittee shall burn natural gas only. Use of natural gas as firing fuel will meet Applicable Requirement for SO₂ emissions. No analysis will be required. [WAC 173-401-615(1)(b)] [BCAA OA 2014-0004 Condition 5.2.2]
 - 6.17.1.3.2. Compliance shall be assured via certification by the permittee's responsible official that the only fuel burned in this process during the reporting period was natural gas. Such certification shall constitute monitoring for purposes of compliance [WAC 173-401-615(1)]
- 6.17.1.4. Record Keeping:** Maintain compliance documents for a period of five (5) years. [WAC 173-401-615(2)(c)]
- 6.17.1.5. Reporting:**

- 6.17.1.5.1. Specific to this Applicable Requirement the permittee shall report according to section 1.13. [WAC 173-401-615(3); WAC 173-401-645(3)(d); WAC 173-400-107(3); WAC 173-400-107(4); WAC 173-400-107(5)]
- 6.17.1.5.2. As part of the 6-month monitoring report required by Condition 1.13 and as part of the annual compliance certification report required by Condition 3.3, the permittee shall report that natural gas was the sole source of fuel burned in this process during the specified reporting period. [WAC 173-401-615(3); WAC 173-401-630(5)(a)]

6.17.2. General PM Limit: Applicable Requirement 2 of 4: State (X)/Federal (X)

WAC 173-400-050(1)

6.17.2.1. Description: Emissions of particulate matter from combustion emissions units shall not exceed 0.23 g/dscm (0.1 grain/dscf) at standard conditions.

6.17.2.2. Test Method:

6.17.2.2.1. Test Method 1: Qualitative Assessment

6.17.2.2.2. Test Method 2: 40 CFR 60 Appendix A Method 9 (if required)

6.17.2.3. Monitoring: See the opacity monitoring requirements specified in Condition 5.1, Applicable Requirement 1 (page 16). [WAC 173-401-615(1)]

6.17.2.4. Record Keeping: See the record keeping requirements specified in Condition 5.1, Applicable Requirement 1. [WAC 173-401-615(2)]

6.17.2.5. Reporting: See the reporting requirements specified in Condition 5.1, Applicable Requirement 1. [WAC 173-401-615(3)]

6.17.3. Nitrogen Oxides Limit: Applicable Requirement 3 of 4: State (X)/Federal (X)

WAC 173-400-050(1)

6.17.3.1. Description: Emissions of NO_x from shall not exceed 0.7 tons per year.

6.17.3.2. Test Method: No test method required, monitoring, record keeping and reporting only.

6.17.3.3. Monitoring:

6.17.3.3.1. Permittee shall burn natural gas only. Use of natural gas as firing fuel will meet Applicable Requirement for NO_x emissions. No analysis will be required. [WAC 173-401-615(1)(b)] [BCAA OA 2014-0004 Condition 5.2.2]

6.17.3.3.2. Compliance shall be assured via certification by the permittee's responsible official that the only fuel burned in this process during the reporting period was natural gas. Such certification shall constitute monitoring for purposes of compliance [WAC 173-401-615(1)]

6.17.3.4. Record Keeping: Maintain compliance documents for a period of five (5) years. [WAC 173-401-615(2)(c)]

6.17.3.5. Reporting:

- 6.17.3.5.1. Specific to this Applicable Requirement the permittee shall report according to section 1.13. [WAC 173-401-615(3); WAC 173-401-645(3)(d); WAC 173-400-107(3); WAC 173-400-107(4); WAC 173-400-107(5)]
- 6.17.3.5.2. As part of the 6-month monitoring report required by Condition 1.13 and as part of the annual compliance certification report required by Condition 3.3, the permittee shall report that natural gas was the sole source of fuel burned in this process during the specified reporting period. [WAC 173-401-615(3); WAC 173-401-630(5)(a)]

7. APPLICABLE REQUIREMENTS – PROCESS SPECIFIC FOR FINLEY AREA

The Finley area of the Agrium facility consists of 21 processes of which 4 are designated as IEUs. Source-specific, Applicable Requirements for the remaining 17 processes are addressed in this section. The IEUs for this area are listed in Table 8 of the Statement of Basis and any Applicable Requirements for these IEUs are addressed in Section 9 of this permit. The remainder of this section details the monitoring, record keeping, and reporting requirements for processes with specific Applicable Requirements for the Finley area.

7.1. Process 34: Exhaust stack for F-600-C (boiler 3)

7.1.1. Sulfur Dioxide Limit

Applicable Requirement 1 of 2: State (X)/Federal (X)

WAC 173-400-040(7)

- 7.1.1.1. Description:** Sulfur dioxide. No person shall cause or permit the emission of a gas containing sulfur dioxide from any emissions unit in excess of 1000 ppm of sulfur dioxide on a dry basis, corrected to seven percent oxygen for combustion sources, and based on the average of any period of 60 consecutive minutes.
- 7.1.1.2. Test Method:** No test method required, monitoring, record keeping and reporting only.
- 7.1.1.3. Monitoring:**
- 7.1.1.3.1. Permittee shall burn natural gas only. Use of natural gas as firing fuel will meet Applicable Requirement for SO₂ emissions. No analysis will be required. [WAC 173-401-615(1)(b)]
 - 7.1.1.3.2. Compliance shall be assured via certification by the permittee's responsible official that the only fuel burned in this process during the reporting period was natural gas. Such certification shall constitute monitoring for purposes of compliance [WAC 173-401-615(1)]
- 7.1.1.4. Record Keeping:** 7.1.1.4.1. Maintain compliance documents for a period of five (5) years. [WAC 173-401-615(2)(c)]
- 7.1.1.5. Reporting:**
- 7.1.1.5.1. Specific to this Applicable Requirement the permittee shall report according to section 1.13. [WAC 173-401-615(3); WAC 173-401-645(3)(d); WAC 173-400-107(3); WAC 173-400-107(4); WAC 173-400-107(5)]
 - 7.1.1.5.2. As part of the 6-month monitoring report required by Condition 1.13 and as part of the annual compliance certification report required by Condition 3.3, the permittee shall report that natural gas was the sole fuel burned in this process during the specified reporting period. [WAC 173-401-615(3); WAC 173-401-630(5)(a)]

7.1.2. General PM Limit : Applicable Requirement 2 of 2: State (X)/Federal (X)

AC 173-400-050(1)

- 7.1.2.1. Description:** Emissions of particulate matter from combustion emissions units shall not exceed 0.23 g/dscm (0.1 grain/dscf) at standard conditions. [WAC 173-400-060]
- 7.1.2.2. Test Method:**
- 7.1.2.2.1. Test Method 1: Qualitative Assessment
 - 7.1.2.2.2. Test Method 2: 40 CFR 60 Appendix A Method 9 (if required)
- 7.1.2.3. Monitoring:** See the opacity monitoring requirements specified in Condition 5.1, Applicable Requirement 1 (page 16). [WAC 173-401-615(1)]
- 7.1.2.4. Record Keeping:** See the record keeping requirements specified in Condition 5.1, Applicable Requirement 1. [WAC 173-401-615(2)]
- 7.1.2.5. Reporting:** See the reporting requirements specified in Condition 5.1, Applicable Requirement 1. [WAC 173-401-615(3)]

7.2. Process 42: Utility flare stack

7.2.1. Sulfur Dioxide Limit: Applicable Requirement 1 of 2: State (X)/Federal (X)

WAC 173-400-040(7)

- 7.2.1.1. Description:** Sulfur dioxide. No person shall cause or permit the emission of a gas containing sulfur dioxide from any emissions unit in excess of 1000 ppm of sulfur dioxide on a dry basis, corrected to seven percent oxygen for combustion sources, and based on the average of any period of 60 consecutive minutes.
- 7.2.1.2. Test Method:** No test method required, monitoring, record keeping and reporting only.
- 7.2.1.3. Monitoring:**
- 7.2.1.3.1. Permittee shall burn natural gas only. Use of natural gas as firing fuel will meet Applicable Requirement for SO₂ emissions. No analysis will be required. [WAC 173-401-615(1)(b)]
 - 7.2.1.3.2. Compliance shall be assured via certification by the permittee's responsible official that the only fuel burned in this process during the reporting period was natural gas. Such certification shall constitute monitoring for purposes of compliance [WAC 173-401-615(1)]
- 7.2.1.4. Record Keeping:** Maintain compliance documents for a period of five (5) years. [WAC 173-401-615(2)(c)]
- 7.2.1.5. Reporting:**
- 7.2.1.5.1. Specific to this Applicable Requirement the permittee shall report according to section 1.13. [WAC 173-401-615(3); WAC 173-401-645(3)(d); WAC 173-400-107(3); WAC 173-400-107(4); WAC 173-400-107(5)]

- 7.2.1.5.2. As part of the 6-month monitoring report required by Condition 1.13 and as part of the annual compliance certification report required by Condition 3.3, the permittee shall report that natural gas was the sole source of fuel burned in this process during the specified reporting period. [WAC 173-401-615(3); WAC 173-401-630(5)(a)]

7.2.2. General PM Limit: Applicable Requirement 2 of 2: State (X)/Federal (X)

WAC 173-400-050(1)

- 7.2.2.1. Description:** Emissions of particulate matter from combustion emissions units shall not exceed 0.23 g/dscm (0.1 grain/dscf) at standard conditions.
- 7.2.2.2. Test Method:**
- 7.2.2.2.1. Test Method 1: Qualitative Assessment
- 7.2.2.2.2. Test Method 2: 40 CFR 60 Appendix A Method 9 (if required)
- 7.2.2.3. Monitoring:** See the opacity monitoring requirements specified in Condition 5.1, Applicable Requirement 1 (page 16). [WAC 173-401-615(1)]
- 7.2.2.4. Record Keeping:** See the record keeping requirements specified in Condition 5.1, Applicable Requirement 1. [WAC 173-401-615(2)]
- 7.2.2.5. Reporting:** See the reporting requirements specified in Condition 5.1, Applicable Requirement 1. [WAC 173-401-615(3)]

7.3. Process 50: Field Vent Flare Stack

7.3.1. Sulfur Dioxide Limit: Applicable Requirement 1 of 2: State (X)/Federal (X)

WAC 173-400-040(7)

- 7.3.1.1. Description:** Sulfur dioxide. No person shall cause or permit the emission of a gas containing sulfur dioxide from any emissions unit in excess of 1000 ppm of sulfur dioxide on a dry basis, corrected to seven percent oxygen for combustion sources, and based on the average of any period of 60 consecutive minutes.
- 7.3.1.2. Test Method:** No test method required, monitoring, record keeping and reporting only.
- 7.3.1.3. Monitoring:**
- 7.3.1.3.1. Permittee shall burn natural gas only. Use of natural gas as firing fuel will meet Applicable Requirement for SO₂ emissions. No analysis will be required. [WAC 173-401-615(1)(b)]
- 7.3.1.3.2. Compliance shall be assured via certification by the permittee's responsible official that the only fuel burned in this process during the reporting period was natural gas. Such certification shall constitute monitoring for purposes of compliance [WAC 173-401-615(1)]
- 7.3.1.4. Record Keeping:** Maintain compliance documents for a period of five (5) years. [WAC 173-401-615(2)(c)]

7.3.1.5. Reporting:

- 7.3.1.5.1. Specific to this Applicable Requirement the permittee shall report according to section 1.13. [WAC 173-401-615(3); WAC 173-401-645(3)(d); WAC 173-400-107(3); WAC 173-400-107(4); WAC 173-400-107(5)]
- 7.3.1.5.2. As part of the 6-month monitoring report required by Condition 1.13 and as part of the annual compliance certification report required by Condition 3.3, the permittee shall report that natural gas was the sole source of fuel burned in this process during the specified reporting period. [WAC 173-401-615(3); WAC 173-401-630(5)(a)]

7.3.2. General PM Limit: Applicable Requirement 2 of 2: State (X)/Federal (X)

AC 173-400-050(1)

- 7.3.2.1. Description:** Emissions of particulate matter from combustion emissions units shall not exceed 0.23 g/dscm (0.1 grain/dscf) at standard conditions.
- 7.3.2.2. Test Method:**
 - 7.3.2.2.1. Test Method 1: Qualitative Assessment
 - 7.3.2.2.2. Test Method 2: 40 CFR 60 Appendix A Method 9 (if required)
- 7.3.2.3. Monitoring:** See the opacity monitoring requirements specified in Condition 5.1, Applicable Requirement 1 (page 16). [WAC 173-401-615(1)]
- 7.3.2.4. Record Keeping:** See the record keeping requirements specified in Condition 5.1, Applicable Requirement 1. [WAC 173-401-615(2)]
- 7.3.2.5. Reporting:** See the reporting requirements specified in Condition 5.1, Applicable Requirement 1. [WAC 173-401-615(3)]

8. APPLICABLE REQUIREMENTS – PROCESS SPECIFIC FOR HEDGES AREA

The Hedges area of the Agrium facility consists of 6 processes of which 4 are designated as IEUs. Source-specific, Applicable Requirements for the remaining 2 processes are addressed in this section. The IEUs for this area are listed in Table 9 of the Statement of Basis and any Applicable Requirements for these IEUs are addressed in Section 9 of this permit. The remainder of this section details the monitoring, record keeping, and reporting requirements for processes with specific Applicable Requirements for the Hedges area.

8.1. Process 62: Utility Flare Stack 50

8.1.1. Sulfur Dioxide Limit: Applicable Requirement 1 of 2: State (X)/Federal (X)

WAC 173-400-040(7)

- 8.1.1.1. Description:** Sulfur dioxide. No person shall cause or permit the emission of a gas containing sulfur dioxide from any emissions unit in excess of 1000 ppm of sulfur dioxide on a dry basis, corrected to seven percent oxygen for combustion sources, and based on the average of any period of 60 consecutive minutes.
- 8.1.1.2. Test Method:** No test method required, monitoring, record keeping and reporting only.
- 8.1.1.3. Monitoring:**
- 8.1.1.3.1. Permittee shall burn natural gas only. Use of natural gas as firing fuel will meet Applicable Requirement for SO₂ emissions. No analysis will be required. [WAC 173-401-615(1)(b)]
 - 8.1.1.3.2. Compliance shall be assured via certification by the permittee's responsible official that the only fuel burned in this process during the reporting period was natural gas. Such certification shall constitute monitoring for purposes of compliance [WAC 173-401-615(1)]
- 8.1.1.4. Record Keeping:** Maintain compliance documents for a period of five (5) years. [WAC 173-401-615(2)(c)]
- 8.1.1.5. Reporting:**
- 8.1.1.5.1. Specific to this Applicable Requirement the permittee shall report according to section 1.13. [WAC 173-401-615(3); WAC 173-401-645(3)(d); WAC 173-400-107(3); WAC 173-400-107(4); WAC 173-400-107(5)]
 - 8.1.1.5.2. As part of the 6-month monitoring report required by Condition 1.13 and as part of the annual compliance certification report required by Condition 3.3, the permittee shall report that natural gas was the sole source of fuel burned in this process during the specified reporting period. [WAC 173-401-615(3); WAC 173-401-630(5)(a)]

8.1.2. General PM Limit: Applicable Requirement 2 of 2: State (X)/Federal (X)

WAC 173-400-050(1)

8.1.2.1. Description: Emissions of particulate matter from combustion emissions units shall not exceed 0.23 g/dscm (0.1 grain/dscf) at standard conditions.

8.1.2.2. Test Method:

8.1.2.2.1. Test Method 1: Qualitative Assessment

8.1.2.2.2. Test Method 2: 40 CFR 60 Appendix A Method 9 (if required)

8.1.2.3. Monitoring: See the opacity monitoring requirements specified in Condition 5.1, Applicable Requirement 1 (page 16). [WAC 173-401-615(1)]

8.1.2.4. Record Keeping: See the record keeping requirements specified in Condition 5.1, Applicable Requirement 1. [WAC 173-401-615(2)]

8.1.2.5. Reporting: See the reporting requirements specified in Condition 5.1, Applicable Requirement 1. [WAC 173-401-615(3)]

9. INSIGNIFICANT EMISSION UNITS

The IEUs for the Kennewick, Finley, and Hedges areas are listed in the Statement of Basis, Tables 7, 8, and 9, respectively. The federally enforceable, facility-wide Applicable Requirements addressed in Section 5.0 of this permit apply to these sources, per WAC 173-401-530(2)(a). Additionally, some of the generally Applicable Requirements, which are not addressed in Section 5.0, apply to these IEUs, and are identified in this section. Per WAC 173-401-530(2)(c), testing, monitoring, record keeping, and reporting requirements are not required for IEUs. Additionally, per WAC 173-401-530(2)(d), the permittee is not required to certify compliance under WAC 173-401-650(5) for IEUs.

Kennewick Area

9.1. Process 22A: Plant 8 CAN-17 Celatom Transfer

9.1.1. General PM Limit: Applicable Requirement 1 of 2: State (X)/Federal (X)

WAC 173-400-060

9.1.1.1. Description: No person shall cause or permit emission of particulate material from any general process operation in excess of 0.23 g/dscm (0.1 grain/dscf) at standard conditions of exhaust gas. [WAC 173-400-060]

9.1.2. Order of Approval No. 2002-0014:

Applicable Requirement 2 of 2: State (X)/Federal (X)

9.1.2.1. Description: This unit shall be operated according to Agrium Standard Operating Procedures.

9.2. Process 22B: Plant 8 CAN-17 Celatom Wet Mixer

9.2.1. General PM Limit: Applicable Requirement 1 of 2: State (X)/Federal (X)

WAC 173-400-060

9.2.1.1. Description: No person shall cause or permit emission of particulate material from any general process operation in excess of 0.23 g/dscm (0.1 grain/dscf) at standard conditions of exhaust gas. . [WAC 173-400-060]

9.2.2. Order of Approval No. 2002-0014:

Applicable Requirement 2 of 2: State (X)/Federal (X)

9.2.2.1. Description: This unit shall be operated according to Agrium Standard Operating Procedures.

Hedges Area

9.3. Process 60: Ammonia Heater 2 (E-400), 61: Ammonia Heater 1 (E-204), and 63: Purge Flare 2

9.3.1. Sulfur dioxide Limit: Applicable Requirement 1 of 2: State (X)/Federal (X)

WAC 173-400-040(7)

9.3.1.1. **Description:** Sulfur dioxide. No person shall cause or permit the emission of a gas containing sulfur dioxide from any emissions unit in excess of 1000 ppm of sulfur dioxide on a dry basis, corrected to seven percent oxygen for combustion sources, and based on the average of any period of 60 consecutive minutes.

9.3.2. General PM Limit: Applicable Requirement 2 of 2: State (X)/Federal (X)

WAC 173-400-050(1)

9.3.2.1. **Description:** Emissions of particulate matter from combustion emissions units shall not exceed 0.23 g/dscm (0.1 grain/dscf) at standard conditions.

10. INAPPLICABLE REQUIREMENTS

The requirements listed below are not applicable to the equipment listed. The provisions of a permit shield, as specified in WAC 173-401-640, shall apply to the sources and requirements identified below. WAC 173-401-530(3) prohibits the permit shield from applying to IEUs. Therefore, the IEUs for the Kennewick Area, Finley Area, and Hedges Area (see Tables 5.1, 5.2, and 5.3, respectively, in the Statement of Basis) are not included in Table 2 below.

Table 2: Inapplicable Requirements

Process No.	Description	Regulation	Reason for Exemption
2	Acid plant 9	WAC 173-400-040(7)	This source does not emit sulfur dioxide.
		WAC 173-400-050	This source is not a combustion or incineration emissions unit.
		WAC 173-400-060	This source does not emit particulate.
2A, and 2B	Acid plant 9	NSPS; WAC 173-040(1)	Per 40 CFR 60.8(c), the NSPS Subpart G standards are not applicable during periods of start-up and shutdown.
		WAC 173-400-040(7)	This source does not emit sulfur dioxide.
		WAC 173-400-050	This source is not a combustion or incineration emissions unit.
		WAC 173-400-060	This source does not emit particulate.
3	Acid plant 7	NSPS	Existing facility built in 1969 prior to the effective date of 8/17/71, 40 CFR 60.70(b), Subpart G.
		WAC 173-400-040(7)	This source does not emit sulfur dioxide.
		WAC 173-400-050	This source is not a combustion or incineration emissions unit.
		WAC 173-400-060	This source does not emit particulate.
5	Plant 3 AN Solution/Granulation	WAC 173-400-040(7)	This source does not emit sulfur dioxide.
		WAC 173-400-050	This source is not a combustion or incineration emissions unit.
5B	Plant 3 GAN	WAC 173-400-040(7)	This source does not emit sulfur dioxide.
		WAC 173-400-050	This source is not a combustion or incineration emissions unit.
6	Ammonium Nitrate Solution Prod. (Plant 8 MCC Neutralizer)	WAC 173-400-040(7)	This source does not emit sulfur dioxide.
		WAC 173-400-050	This source is not a combustion or incineration emissions unit.
7	Ammonium Nitrate Solution Prod. (Plant 10 MCC Neutralizer)	WAC 173-400-040(7)	This source does not emit sulfur dioxide.
		WAC 173-400-050	This source is not a combustion or incineration emissions unit.
8	Ammonium Nitrate Granulation Process (Plant 10)	WAC 173-400-040(7)	This source does not emit sulfur dioxide.

Process No.	Description	Regulation	Reason for Exemption
		WAC 173-400-050	This source is not a combustion or incineration emissions unit.
8A	GAN Fluid Bed Cooler (Plant 10)	WAC 173-400-040(7)	This source does not emit sulfur dioxide.
		WAC 173-400-050	This source is not a combustion or incineration emissions unit.
11	Solid urea storage and handling	WAC 173-400-040(7)	This source does not emit sulfur dioxide.
		WAC 173-400-050	This source is not a combustion or incineration emissions unit.
12	Urea loading	WAC 173-400-040(7)	This source does not emit sulfur dioxide.
		WAC 173-400-050	This source is not a combustion or incineration emissions unit.
13	Boiler F-521 (CB-3)	NSPS	Existing facility built in 1980 prior to the effective date of 6/9/89, 40 CFR 60.40c (a), Subpart Dc.
		WAC 173-400-060	This source is a combustion source and is subject to the grain loading standards specified in WAC 173-400-050.
15	Boiler F-513 (CB-2)	NSPS	Existing facility built in 1969 prior to the effective date of 6/9/89, 40 CFR 60.40c (a), Subpart Dc.
		WAC 173-400-060	This source is a combustion source and is subject to the grain loading standards specified in WAC 173-400-050.
16	Boiler F-502 (Ames)	NSPS	Existing facility built in 1962 prior to the effective date of 6/9/89, 40 CFR 60.40c (a), Subpart Dc.
		WAC 173-400-060	This source is a combustion source and is subject to the grain loading standards specified in WAC 173-400-050.
17	Nitric Acid Concentrator Process	WAC 173-400-040(7)	This source does not emit sulfur dioxide.
		WAC 173-400-050	This source is not a combustion or incineration emissions unit.
		WAC 173-400-060	This source does not emit particulate.
19	UAN-32 Solution Production (Plant 8)	WAC 173-400-040(7)	This source does not emit sulfur dioxide.
		WAC 173-400-050	This source is not a combustion or incineration emissions unit.
19A	UAN-32 Urea Transfer	WAC 173-400-040(7)	This source does not emit sulfur dioxide.
		WAC 173-400-050	This source is not a combustion or incineration emissions unit.
20	UAN-32 Solution Production (Plant 11)	WAC 173-400-040(7)	This source does not emit sulfur dioxide.
		WAC 173-400-050	This source is not a combustion or incineration emissions unit.
21	CAN-17 Solution Production (Plant 8)	WAC 173-400-040(7)	This source does not emit sulfur dioxide.
		WAC 173-400-050	This source is not a combustion or incineration emissions unit.

Process No.	Description	Regulation	Reason for Exemption
22	CAN-17 Calcium Carbonate Transfer (Plant 8)	WAC 173-400-040(7)	This source does not emit sulfur dioxide.
		WAC 173-400-050	This source is not a combustion or incineration emissions unit.
23	Anhydrous Ammonia Storage and Transfer	WAC 173-400-040(2)	This source does not emit pollutants that would cause visible emissions.
		WAC 173-400-040(7)	This source does not emit sulfur dioxide.
		WAC 173-400-050	This source is not a combustion or incineration emissions unit.
		WAC 173-400-060	This source does not emit particulate.
		WAC 173-400-060	This source is a combustion source and is subject to the grain loading standards specified in WAC 173-400-050.
34	Finley Boiler no. 3 (Boiler F-600-C)	NSPS	Existing facility built in 1956 prior to the effective date of 6/9/89, 40 CFR 60.40c (a), Subpart Dc.
		WAC 173-400-060	This source is a combustion source and is subject to the grain loading standards specified in WAC 173-400-050.
		WAC 173-400-060	This source does not emit particulate.
42	Utility Flare	WAC 173-400-060	This source is a combustion source and is subject to the grain loading standards specified in WAC 173-400-050.
		WAC 173-400-060	This source does not emit particulate.
48	Anhydrous Ammonia Storage and Transfer	WAC 173-400-040(2)	This source does not emit pollutants that would cause visible emissions.
		WAC 173-400-040(7)	This source does not emit sulfur dioxide.
		WAC 173-400-050	This source is not a combustion or incineration emissions unit.
		WAC 173-400-060	This source does not emit particulate.
62	Utility Flare 1	WAC 173-400-060	This source is a combustion source and is subject to the grain loading standards specified in WAC 173-400-050.