



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor
Toni Hardesty, Director

February 3, 2005

Certified Mail No. 7000 0520 0016 0850 4547

Alan Swenson
Plant Manager
The Amalgamated Sugar Company L.L.C.
Route 1, Box 700
Paul, ID 83347

RE: Facility ID No. 067-00001, The Amalgamated Sugar Company L.L.C., Paul, Idaho
Final Permit Letter

Dear Mr. Swenson:

The Idaho Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) Number P-050401 for The Amalgamated Sugar Company L.L.C. (TASCO) in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho). This permit is effective immediately and is based on your permit application received on January 7, 2005.

This permit does not release TASCO from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

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

Sincerely,

Martin Bauer, Administrator
Air Quality Division

MB/CM/sd
Enclosures

Permit No. P-050401



Air Quality
PERMIT TO CONSTRUCT
State of Idaho
Department of Environmental Quality

PERMIT No.: P-050401
FACILITY ID No.: 067-00001
AQCR: 63 **CLASS:** A
SIC: 2063 **ZONE:** 12
UTM COORDINATE (km): 274.0, 4712.0

1. **PERMITTEE**
The Amalgamated Sugar Company LLC

2. **PROJECT**
No. 6 Evaporator – Permit Revision

3. MAILING ADDRESS Route 1, Box 700	CITY Paul	STATE ID	ZIP 83347
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4. FACILITY CONTACT Alan Swenson	TITLE Plant Manager	TELEPHONE (208) 438-2115
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5. RESPONSIBLE OFFICIAL Alan Swenson	TITLE Plant Manager	TELEPHONE (208) 438-2115
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6. EXACT PLANT LOCATION 50 S. 500 W., Paul, Idaho	COUNTY Minidoka
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7. **GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**
Sugar beet processing

8. **GENERAL CONDITIONS**

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

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

This permit is not transferable to another person, place, or piece or set of equipment. This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

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



TONI HARDESTY, DIRECTOR
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: February 3, 2005

Acronyms, Units, and Chemical Nomenclature

AQCR	Air Quality Control Region
campaign year	the period starting with the first day of new beet crop processing and ending the day before the start of the next year's beet crop processing.
CO	carbon monoxide
cwt	hundred weight (1cwt = 100 lbs)
DEQ	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
HAPs	hazardous air pollutants
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
<i>Rules</i>	<i>Rules for the Control of Air Pollution in Idaho</i>
SIC	Standard Industrial Classification
SO ₂	sulfur dioxide
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

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Permittee:	TASCO – MiniCassia Facility	Facility ID No. 067-00001	Date Issued:	February 3, 2005
Location:	Paul, Idaho			

1. PERMIT TO CONSTRUCT SCOPE

Purpose

This PTC is a revision of PTC No. 067-00001, issued September 23, 2002. The sugar throughput limit has been replaced with a steam production rate limit. Emissions do not increase as a result of this permit revision.

This PTC replaces PTC No. 067-00001, issued September 23, 2002, the terms and conditions of which shall no longer apply.

Regulated Sources

Table 1.1 below lists all sources of emissions that are regulated in this PTC:

Table 1.1 REGULATED SOURCES OF EMISSIONS

Permit Section	Source Description	Emissions Control(s)
3	Sugar production facility	Various

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2. FACILITY LIMITS

2.1 Process Description

The No. 6 Evaporator is used to evaporate water from sugar juices to produce dry granulated sugar.

Emissions Limits

2.2 Opacity Limit

Emissions from any stack, vent, or functionally equivalent opening associated with the processing of beets or the production of sugar, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625 (Rules for the Control of Air Pollution in Idaho). Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

Operating Requirements

2.3 Beet Throughput Limits

- Throughput of beets to the facility shall not exceed 16,550 T/day.
- Throughput of beets to the facility shall not exceed 2,966,000 tons per campaign year.

2.4 Steam Production Limit

Steam production from the facility's boilers shall not exceed 1,830,000 thousand pounds of steam per campaign year (klb/yr).

2.5 Reasonable Control of Fugitive Emissions

All reasonable precautions shall be taken to prevent PM from becoming airborne as required in IDAPA 58.01.01.651. In determining what is a reasonable, consideration will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of PM. Some of the reasonable precautions include, but are not limited to, the following:

- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands;
- Application, where practical, of asphalt, oil, water or suitable chemicals to, or covering of dirt roads, material stockpiles, and other surfaces which can create dust;
- Installation and use, where practical, of hoods, fans and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations;
- Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts;

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- Paving of roadways and their maintenance in a clean condition, where practical; or
- Prompt removal of earth or other stored material from streets, where practical.

2.6 Air Pollution Emergency Rules

The permittee shall comply with the Air Pollution Emergency Rules in IDAPA 58.01.01.550-562.

Monitoring and Recordkeeping Requirements

2.7 Beet Throughput Monitoring

The permittee shall monitor and record the daily and annual beet throughput to the facility to demonstrate compliance with Permit Condition 2.2. Annual throughput shall be determined by summing each daily throughput monthly, and then summing monthly throughput for the campaign year. A compilation of the most recent two years of records shall be kept onsite and shall be made available to DEQ representatives upon request.

2.8 Steam Production Monitoring

The permittee shall monitor and record the steam production monthly and annually to demonstrate compliance with Permit Condition 2.3. Annual steam production shall be determined by summing each monthly steam production for the campaign year. A compilation of the most recent two years of records shall be kept onsite and shall be made available to DEQ representatives upon request.

2.9 Fugitive Dust Monitoring

The permittee shall conduct a monthly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive emission inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed); any corrective action taken in response to the fugitive emissions; and the date the corrective action was taken.

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3. PERMIT TO CONSTRUCT GENERAL PROVISIONS

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the *Rules for the Control of Air Pollution in Idaho*. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the *Rules for the Control of Air Pollution in Idaho*, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq., and the permittee is subject to penalties for each day of noncompliance.
2. The permittee shall at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.
3. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
 - To enter, at reasonable times, upon the premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
 - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack compliance testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.
4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
5. The permittee shall notify DEQ, in writing, of the required information for the following events within five working days after occurrence:
 - Initiation of Construction - Date
 - Completion/Cessation of Construction - Date
 - Actual Production Startup - Date
 - Initial Date of Achieving Maximum Production Rate - Production Rate and Date
6. If compliance testing is specified, the permittee must schedule and perform such testing within 60 days after achieving the maximum production rate, and not later than 180 days after initial startup. This requirement shall be construed as an ongoing requirement. The permittee shall not operate the source without testing within 180 days. If testing is not conducted within 180 days after initial startup, then each day of operation thereafter without the required compliance test constitutes a violation. Such testing must **strictly** adhere to the procedures outlined in IDAPA 58.01.01.157 and shall not be conducted on weekends or state holidays without prior written approval from DEQ. Testing procedures and specific time limitations may be modified by DEQ by prior negotiation if conditions warrant adjustment. DEQ shall be notified at least 15 days prior to the scheduled compliance test. Any records or data generated as a result of such compliance test shall be made available to DEQ upon request.

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The maximum allowable operating rate shall be limited to 120% of the average operating rate attained during any compliance test period, for which a test protocol has been granted prior approval by DEQ, unless (1) the test demonstrates noncompliance; (2) a more restrictive operating limit is specified elsewhere in this permit; or (3) at such an operating rate, emissions would exceed any emissions limit(s) set forth in this permit.

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