



**Air Quality Permitting
Statement of Basis**

January 25, 2005

**Permit to Construct
No. P-050401**

**The Amalgamated Sugar Company LLC
Mini-Cassia Facility
Paul, Idaho**

Facility ID No. 067-00001

Prepared by:

**Charlie Mazzone, P.E.,
AIR QUALITY DIVISION**

FINAL

Table of Contents

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE	3
1. PURPOSE	4
2. FACILITY DESCRIPTION	4
3. FACILITY / AREA CLASSIFICATION.....	4
4. APPLICATION SCOPE.....	4
5. PERMIT ANALYSIS	4
6. PERMIT CONDITIONS	5
7. FEES	5
8. PUBLIC COMMENT.....	6
9. RECOMMENDATION.....	6
10. AIRS INFORMATION	7

Acronyms, Units, and Chemical Nomenclature

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
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 (1 cwt = 100 lb)
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
MACT	Maximum Available Control Technology
NESHAP	Nation Emission Standards for Hazardous Air Pollutants
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD	Prevention of Significant Deterioration
SIC	Standard Industrial Classification
SO ₂	sulfur dioxide
TASCO	The Amalgamated Sugar Company LLC
T/yr	tons per any consecutive 12-month period
UTM	Universal Transverse Mercator
VOC	volatile organic compound

1. PURPOSE

The purpose for this memorandum is to satisfy the requirements of IDAPA 58.01.01.200, *Rules for the Control of Air Pollution in Idaho* for issuing permits to construct (PTC).

2. FACILITY DESCRIPTION

This facility is a sugar beet processing plant in which sugar beets are processed into refined sugar.

3. FACILITY / AREA CLASSIFICATION

This facility is classified as a major facility for both Title V and PSD programs, and emits SO₂, NO_x, CO, PM₁₀, PM, and HAPs at major source levels. The AIRS classification is "A" for all the above pollutants and "B" for VOCs. The SIC code defining the facility is 2063.

This facility is located within AQCR 63 and UTM zone 12. The facility is located in Twin Falls County, which is designated as an attainment or unclassifiable area for all criteria air pollutants.

The AIRS information provided in the Appendix defines the classification for each regulated air pollutant. This required information is entered into the EPA AIRs database.

4. APPLICATION SCOPE

This permitting action is a permit revision. Specifically, the Amalgamated Sugar Company LLC (TASCO) requested that a 7,000,000 lb sugar production limit established by the previous PTC be replaced by a steam production limit of 1,830,000 klb of steam per campaign year. There is no emissions increase with the proposed action.

4.1 Application Chronology

September 23, 2002	PTC No. 067-00001 was issued for construction of a sixth evaporator. Throughput limits were established for beet throughput and sugar production.
January 7, 2005	TASCO requests sugar production limit be replaced by steam production limit.
February 3, 2005	PTC No. P-050401 is issued with the requested production limit change.

5. PERMIT ANALYSIS

This section of the Statement of Basis describes the regulatory requirements for this PTC.

5.1 Equipment Listing

This modification affects only the Erie City boiler and the B&W boiler, which will be limited in total steam production.

5.2 Emissions Inventory

There is no increase in emissions associated with this permit revision; therefore, a new emissions inventory is not required.

5.3 Modeling

There is no increase in emissions associated with this permit revision; therefore, modeling is not required.

5.4 Regulatory Review

This section describes the regulatory analysis of the applicable air quality rules with respect to this PTC.

IDAPA 58.01.01.200..... Procedures and Requirements for Permits to Construct

This permitting action is a permit revision. This permit revision does not result in an emissions increase.

IDAPA 58.01.01.209..... Procedure of Issuing Permits

This permitting action does not require an opportunity of public comment because there is no emissions increase.

6. PERMIT CONDITIONS

This section lists only those permit conditions that have changed or have been deleted as a result of this permit revision. All other permit conditions remain unchanged. Permit conditions related to the revised permit are identified as Revised Permit Conditions. Permit conditions related to the existing permit are identified as Existing Permit Conditions.

- 6.1 Existing Permit Condition 2.4 limits sugar production to 7,000,000 cwt per consecutive 12-month period.
- 6.2 Revised Permit Condition 2.4 limits steam production to 1,830,000 thousand pounds of steam per year. This limit is the amount of steam required to produce 7,000,000 cwt of sugar. Because of the steam efficiencies inherent with the evaporator system, TASC0 is able to produce more granulated sugar with the same steaming rate. Because the steaming rate is not changing, which is equivalent to the amount of fuel combusted; there is not an increase in emissions.
- 6.3 Existing Permit Condition 2.8 requires that TASC0 monitor and record the amount of sugar produced to demonstrate compliance with the sugar throughput limit.
- 6.4 Revised Permit Condition 2.8 requires that TASC0 monitor and record the steam production to demonstrate compliance with the steam production limit.

7. FEES

TASC0 paid the required PTC application fee of \$1,000.00 on January 5, 2005. A processing fee of \$500.00 (General Permit processing fee) was paid on January 26, 2004.

8. PUBLIC COMMENT

In accordance with IDAPA 58.01.01.209.04, an opportunity for public comment is not required because there is no emissions increase.

9. RECOMMENDATION

Based on the review of the application materials, and all applicable state and federal regulations, staff recommends that DEQ issue final PTC No. P-050401 to the Amalgamated Sugar Company LLC. No public comment period is required in accordance with IDAPA 58.01.01.404.04.

CM/sd Permit No. P-050401

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APPENDIX A

10. AIRS INFORMATION

AIRS/AFS* FACILITY-WIDE CLASSIFICATION* DATA ENTRY FORM

AIR PROGRAM	SIP	PSD	NSPS (Part 60)	NESHAP (Part 61)	MACT (Part 63)	TITLE V	AREA CLASSIFICATION
POLLUTANT							A - Attainment U - Unclassifiable N - Nonattainment
SO ₂	A	A				A	U
NO _x	A	A				A	U
CO	A	A				A	U
PM ₁₀	A	A				A	U
PT (Particulate)	A	A					U
VOC	B					B	U
THAP (Total HAPs)	A					A	
Acetaldehyde	A					A	
			APPLICABLE SUBPART				

* Aerometric Information Retrieval System (AIRS) Facility Subsystem (AFS)

^b AIRS/AFS Classification Codes:

A = Actual or potential emissions of a pollutant are above the applicable major source threshold. For NESHAP only, class "A" is applied to each pollutant which is below the 10 T/yr threshold, but which contributes to a plant total in excess of 25 T/yr of all NESHAP pollutants.

SM = Potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable regulations or limitations.

B = Actual and potential emissions are below all applicable major source thresholds.

C = Class is unknown.

ND = Major source thresholds are not defined (e.g., radionuclides).