



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

C.L. "Butch" Otter, Governor
Toni Hardesty, Director

May 16, 2007

Certified Mail No. 7005 1160 0000 1550 9941

Alan Hieb
Plant Manager
The Amalgamated Sugar Company
Box 700
Paul, ID 83347

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

Dear Mr. Hieb:

The Idaho Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2007.0023 to The Amalgamated Sugar Company for its facility in Paul, in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho).

This permit is based on your permit application received on February 23, 2007, and on the relevant comments received during the public comment period. This permit is effective immediately and replaces PTC No. P-060404, issued on June 14, 2006, the terms and conditions of which shall no longer apply. This permit does not release The Amalgamated Sugar Company from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

This permit to construct does not contravene any existing Tier I operating permit conditions, therefore the process or equipment may be operated in accordance with the permit to construct. This permit to construct will be incorporated into the Tier I operating permit upon renewal.

Pursuant to General Provision 5 of your permit, it is required that Construction and Operation Notification be provided. Please provide this information as listed to DEQ's Twin Falls Regional Office, 601 Pole Line Rd., Suite 2, Twin Falls, ID 83301.

A representative of the Twin Falls Regional Office will contact you regarding a meeting with DEQ to discuss the permit terms and requirements. DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

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,

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS\BR\slm

Project No. P-2007.0023

Enclosures

c: Bill Allred, Regional Office
Permit Coordinator (Ltr only)
Marilyn Seymore/ Pat Rayne, Air Quality Division
Laurie Kral, US EPA Region 10
Permit Binder
Source File
Phyllis Heitman (Ltr Only)
Reading File (Ltr Only)
Joan Lechtenberg, Public Comment

Table of Contents

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE	3
1. PERMIT TO CONSTRUCT SCOPE.....	4
2. FACILITY LIMITS	5
3. PERMIT TO CONSTRUCT GENERAL PROVISIONS	8

Acronyms, Units, and Chemical Nomenclature

acfm	actual cubic feet per minute
AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
Btu	British thermal unit
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
gpm	gallons per minute
gr	grain (1 lb = 7,000 grains)
HAPs	hazardous air pollutants
hp	horsepower
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
m	meter(s)
MACT	Maximum Achievable Control Technology
MMBtu	million British thermal units
NESHAP	Nation Emission Standards for Hazardous Air Pollutants
NO ₂	nitrogen dioxide
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppm	parts per million
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
scf	standard cubic feet
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SM	synthetic minor
SO ₂	sulfur dioxide
SO _x	sulfur oxides
T/yr	tons per year
µg/m ³	micrograms per cubic meter
UTM	Universal Transverse Mercator
VOC	volatile organic compound

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2007.0023

Permittee:	The Amalgamated Sugar Company, LLC	Facility ID No. 067-00001
Location:	Paul, Idaho	

1. PERMIT TO CONSTRUCT SCOPE

Purpose

- 1.1 The purpose of the permit is to allow for a short-term steam production increase. The increase is only allowed for the juice run part of the 2006 beet campaign.
- 1.2 Those permit conditions that have been modified or revised by this permitting action are identified by a date citation located directly under the permit condition and on the right hand margin.
- 1.3 This PTC replaces PTC No. P-060404, issued on June 14, 2006, the terms and conditions of which shall no longer apply.

Regulated Sources

- 1.4 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

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2007.0023

Permittee:	The Amalgamated Sugar Company, LLC	Facility ID No. 067-00001
Location:	Paul, Idaho	

2. FACILITY LIMITS

2.1 Process Description

This facility is a sugar beet processing plant in which sugar beets are processed into refined 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 19,550 T/day.
- Throughput of beets to the facility shall not exceed 3,200,000 tons per campaign year.

2.4 Steam Production Limit

- 2.4.1 Steam production from the facility's boilers shall not exceed 1,830,000 Klbs of steam per campaign year (Klb/yr) except as allowed by Condition 2.4.2.
- 2.4.2 For the 2006 campaign year, the permittee shall not exceed an additional 110,000 Klbs steam from any combination of: (a) the B&W boiler using coal; or (b) the Erie City boiler using natural gas.
- 2.4.3 To ensure that the steam increase does not exceed the significant emission rate for NOx the permittee shall:
 - 2.4.3.1 For the 2006 campaign juice run, the B&W boiler shall implement NOx reduction improvements, while firing coal.
 - 2.4.3.2 NOx emissions for the B&W boiler shall be reduced by any combination of: (a) fine tuning the combustion air system; or (b) improving the overfire air (OFA); (c) installing a flue gas recirculation (FGR) system; or (d) use low sulfur coal; or (e) any other DEQ-approved alternative.
 - 2.4.3.3 After permit issuance and completing the NOx reduction improvements, TASC0 shall submit a report to IDEQ detailing the NOx reduction improvements. The report shall contain engineering calculations or test data clearly showing that NOx emissions shall remain below the significance level. The report shall be certified in accordance with IDAPA 58.01.01.123.

[05/16/2007]

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2007.0023

Permittee:	The Amalgamated Sugar Company, LLC	Facility ID No. 067-00001
Location:	Paul, Idaho	

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;
- 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 2.3. 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 2.4. 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.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2007.0023

Permittee:	The Amalgamated Sugar Company, LLC	Facility ID No. 067-00001
Location:	Paul, Idaho	

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.

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2007.0023

Permittee:	The Amalgamated Sugar Company, LLC	Facility ID No. 067-00001
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3. PERMIT TO CONSTRUCT GENERAL PROVISIONS

General Compliance

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.

[Idaho Code §39-101, et seq.]

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.

[IDAPA 58.01.01.211, 5/1/94]

3. Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules and regulations.

[IDAPA 58.01.01.212.01, 5/1/94]

Inspection and Entry

4. Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:
 - a. Enter upon the permittee’s premises where an emissions source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;
 - b. Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d. As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108]

Construction and Operation Notification

5. The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211:
 - a. A notification of the date of initiation of construction, within five working days after occurrence;
 - b. A notification of the date of any suspension of construction, if such suspension lasts for one year or more;

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2007.0023

Permittee:	The Amalgamated Sugar Company, LLC	Facility ID No. 067-00001
Location:	Paul, Idaho	

- c. A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date;
- d. A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
- e. A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211, 5/1/94]

Performance Testing

- 6. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/00]

Monitoring and Recordkeeping

- 7. The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Records of monitoring information shall include, but not be limited to the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.211, 5/1/94]

Excess Emissions

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2007.0023

Permittee:	The Amalgamated Sugar Company, LLC	Facility ID No. 067-00001
Location:	Paul, Idaho	

8. The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

[IDAPA 58.01.01.130-136, 4/5/00]

Certification

9. 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.

[IDAPA 58.01.01.123, 5/1/94]

False Statements

10. No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

Tampering

11. No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

Transferability

12. This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

[IDAPA 58.01.01.209.06, 4/11/06]

Severability

13. 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.