



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

Dirk Kempthorne, Governor
C. Stephen Allred, Director

September 23, 2002

CERTIFIED MAIL No. 7000 1670 0013 9128 7956

Alan Swenson, Plant Manager
The Amalgamated Sugar Company, LLC
P.O. Box 700
Paul, ID 83347

RE: PTC No. 067-00001, The Amalgamated Sugar Company, LLC, Paul
(No. 6 evaporator)

Dear Mr. Swenson:

The Department of Environmental Quality (Department) is issuing Permit to Construct (PTC) No. 067-00001 for the Mini-Cassia sugar facility in accordance with IDAPA 58.01.01.200 through 223, *Rules for the Control of Air Pollution in Idaho*. This PTC is effective immediately and is based on your permit application received on August 16, 2002.

This permit does not release The Amalgamated Sugar Company, LLC (TASCO) from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

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

You, as well as any other entity, may have the right to appeal this final agency action pursuant to IDAPA 58.01.23 (*Rules of Administrative Procedure Before the Board of Environmental Quality*). A petition may be filed with the Hearings Coordinator, Department of Environmental Quality, 1410 N. Hilton, Boise, ID 83706-1255, within 35 days of the date of this decision. However, the Department encourages you to contact us to discuss any concerns you may have with the enclosed permit prior to filing a petition for a contested case.

If you have any questions, please contact Dan Salgado at (208) 373-0431 or dsalgado@deq.state.id.us.

Sincerely,


Katherine B. Kelly
Administrator
Air Quality Division

KK/DH/bh P-020407 G:\AIR QUALITY\STATIONARY SOURCE\SS LTD\PTC\TASCO - PAUL\P-020407 FINAL LTR.DOC
Enclosures

cc: Stephen VanZandt, Twin Falls Regional Office Laurie Kral, EPA Region 10
Joan Lechtenberg, Air Quality Division



Air Quality
PERMIT TO CONSTRUCT

State of Idaho
Department of Environmental Quality

PERMIT NO.: 067-00001

AQCR: 63

CLASS: A

SIC: 2063

ZONE: 12

UTM COORDINATE (km): 274 , 4712

1. PERMITTEE

The Amalgamated Sugar Company LLC

2. PROJECT

No. 6 Evaporator Project

3. MAILING ADDRESS

Route 1, Box 700

CITY

Paul

STATE

ID

ZIP

83347

4. FACILITY CONTACT

Alan Swenson

TITLE

Plant Manager

TELEPHONE

(208) 438-2115

5. RESPONSIBLE OFFICIAL

Alan Swenson

TITLE

Plant Manager

TELEPHONE

(208) 438-2115

6. EXACT PLANT LOCATION

50 S. 500 W., Paul, Idaho

COUNTY

Minidoka

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 Department approval pursuant to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.200, et seq.


KATHERINE B. KELLY, ADMINISTRATOR, AIR QUALITY DIVISION
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: September 23, 2002

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

AQCR	Air Quality Control Region
CO	carbon monoxide
cwt	hundred weight (1cwt = 100 lbs)
Department	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
gr	grain (1 lb = 7,000 grains)
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
lb/hr	pound per hour
NO ₂	nitrogen dioxide
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: The Amalgamated Sugar Company LLC
Location: Paul, Idaho

Date Issued: September 23, 2002

1. PERMIT TO CONSTRUCT SCOPE

Purpose

This PTC incorporates the following permit:

- PTC No. 067-00001, issued on January 1, 1984

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

Emissions from the sugar production facility will increase with the addition of the sixth evaporator. The following requirements apply to the entire facility.

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.

[IDAPA 58.01.01.625]

Operating Requirements

2.3 Throughput Limits

The maximum annual throughput of beets to the facility shall not exceed 2,966,000 tons per consecutive 12-month period or 16,550 T/day.

[IDAPA 58.01.01.211]

2.4 Production Limits

The maximum annual sugar production shall not exceed 7,000,000 cwt per any consecutive 12-month period (cwt/yr).

[IDAPA 58.01.01.211]

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 reasonable, considerations 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;

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- 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.

[IDAPA 58.01.01.650]

2.6 Air Pollution Emergency Rules

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

[IDAPA 58.01.01.550-562]

Monitoring and Recordkeeping Requirements

2.7 Throughput Monitoring

The permittee shall monitor and record the daily beet throughput. Each month the permittee shall calculate the total beet production for the most recent 12-month period. A compilation of the most recent two years of records shall be kept onsite and shall be made available to Department representatives upon request.

[IDAPA 58.01.01.211]

2.8 Production Monitoring

Each month, the permittee shall monitor and record the sugar production for that month and for the most recent 12-month period. A compilation of the most recent two years of records shall be kept onsite and shall be made available to Department representatives upon request.

[IDAPA 58.01.01.211]

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 monthly fugitive emission inspection. The records shall, at a minimum, include 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.

[IDAPA 58.01.01.211.01, 5/1/94]

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: 067-00001**Permittee:** The Amalgamated Sugar Company LLC
Location: Paul, Idaho**Date Issued:** September 23, 2002**3. EMISSIONS INVENTORY**

The following table is a summary of the emissions increases and decreases associated with this permit modification. These values are not enforceable limits.

Table 3.1 EMISSIONS INVENTORY

Pollutant	Annual Emissions Increase (T/yr)	Annual Emissions Decrease (T/yr)	Change in Annual Emissions (T/yr)
NO _x	21.8	0.0	21.8
SO ₂	33.6	0.0	33.6
CO	3.0	0.0	3.0
PM/PM ₁₀	8.7	0.0	8.7
VOC	4.1	0.0	3.9
TAPS/HAPS	>190	0.0	>190
Total:			>261

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4. 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 the Department, 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 the Department. Testing procedures and specific time limitations may be modified by the Department by prior negotiation if conditions warrant adjustment. The Department 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 the Department 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 the Department, 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 the department, 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.