



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

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

Dirk Kempthorne, Governor  
Toni Hardesty, Director

December 15, 2005

**Certified Mail No. 7005 1160 0000 1550 0467**

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

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

Dear Mr. Hieb:

The Idaho Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-050421 to Amalgamated Sugar Company LLC (TASCO) for an increase in the daily beet slice throughput limit at TASCO's MiniCassia facility. This permit is issued in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho).

This PTC replaces PTC No. P-050401, issued February 3, 2005, the terms and conditions of which shall no longer apply.

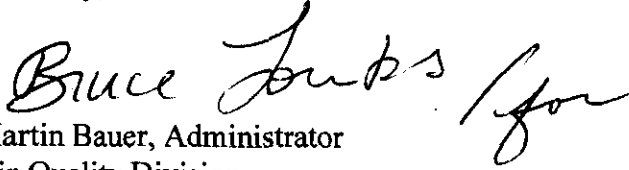
This permit to construct does not contravene any existing Tier I operating permit conditions; therefore, the process or equipment may be operated in accordance with this permit to construct. The terms and conditions of this permit to construct will be incorporated into the facility's Tier operating permit upon renewal.

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.

TASCO – MiniCassia Facility  
December 15, 2005  
Page 2

Sincerely,

A handwritten signature in cursive script that reads "Bruce Lutz for". The signature is written in black ink and is positioned above the typed name.

Martin Bauer, Administrator  
Air Quality Division

MB/BR/ABC/sd  
Enclosures

Permit No. P-050421



**Air Quality  
PERMIT TO CONSTRUCT**

State of Idaho  
Department of Environmental Quality

**PERMIT No.:** P-050421  
**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

|                                      |                     |                 |                     |
|--------------------------------------|---------------------|-----------------|---------------------|
| <b>3. MAILING ADDRESS</b><br>Box 700 | <b>CITY</b><br>Paul | <b>STATE ID</b> | <b>ZIP</b><br>83347 |
|--------------------------------------|---------------------|-----------------|---------------------|

|                                         |                               |                                    |
|-----------------------------------------|-------------------------------|------------------------------------|
| <b>4. FACILITY CONTACT</b><br>Alan Hieb | <b>TITLE</b><br>Plant Manager | <b>TELEPHONE</b><br>(208) 438-2115 |
|-----------------------------------------|-------------------------------|------------------------------------|

|                                             |                               |                                    |
|---------------------------------------------|-------------------------------|------------------------------------|
| <b>5. RESPONSIBLE OFFICIAL</b><br>Alan Hieb | <b>TITLE</b><br>Plant Manager | <b>TELEPHONE</b><br>(208) 438-2115 |
|---------------------------------------------|-------------------------------|------------------------------------|

|                                                             |                           |
|-------------------------------------------------------------|---------------------------|
| <b>6. EXACT PLANT LOCATION</b><br>50 S. 500 W., Paul, Idaho | <b>COUNTY</b><br>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 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:** December 15, 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. |
| 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                                                                                                                                       |
| NH <sub>3</sub>  | ammonia                                                                                                                                         |
| PM               | particulate matter                                                                                                                              |
| PM <sub>10</sub> | 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 <sub>2</sub>  | sulfur dioxide                                                                                                                                  |
| T/yr             | tons per year                                                                                                                                   |
| UTM              | Universal Transverse Mercator                                                                                                                   |
| VOC              | volatile organic compound                                                                                                                       |

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-050421**

|                   |                             |                                  |                     |                   |
|-------------------|-----------------------------|----------------------------------|---------------------|-------------------|
| <b>Permittee:</b> | TASCO – MiniCassia Facility | <b>Facility ID No.</b> 067-00001 | <b>Date Issued:</b> | December 15, 2005 |
| <b>Location:</b>  | Paul, Idaho                 |                                  |                     |                   |

**1. PERMIT TO CONSTRUCT SCOPE**

***Purpose***

This PTC is a modification of PTC No. P-050401, issued February 3, 2005. The daily beet slice has been increased from 16,550 T/day to 19,550 T/day. Annual emissions do not increase as a result of this permit modification.

This PTC replaces PTC No. P-050401, issued February 3, 2005, 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**

| <b>Permit Section</b> | <b>Source Description</b> | <b>Emissions Control(s)</b> |
|-----------------------|---------------------------|-----------------------------|
| 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 19,550 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 2.3. 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.

**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.
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 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.

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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.

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.