



**Air Quality**  
**TIER I OPERATING PERMIT**  
 State of Idaho  
 Department of Environmental  
 Quality

**PERMIT NO.:** 067-00001  
**AQCR:** 063                      **CLASS:** A  
**SIC:** 2063                      **ZONE:** 12  
**UTM COORDINATE (km):** 274.0, 4721.0

**1. PERMITTEE**  
 The Amalgamated Sugar Company LLC - Mini-Cassia Factory

**2. PROJECT**  
 Tier I operating permit

<b>3. MAILING ADDRESS</b> Route 1, Box 700	<b>CITY</b> Paul	<b>STATE ID</b>	<b>ZIP</b> 83347
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<b>4. FACILITY CONTACT</b> Alan Swenson	<b>TITLE</b> Plant Manager	<b>TELEPHONE</b> (208) 438-2115
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<b>5. RESPONSIBLE OFFICIAL</b> Alan Swenson	<b>TITLE</b> Plant Manager	<b>TELEPHONE</b> (208) 438-2115
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<b>6. EXACT PLANT LOCATION</b> 50 South 500 West, Paul, Idaho	<b>COUNTY</b> Minidoka
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**7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**  
 Beet-sugar manufacturing

**8. PERMIT AUTHORITY**

This Tier I operating permit is issued pursuant to Idaho Code §39-115 and the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.300 - 386. The permittee shall comply with the terms and conditions of this permit.

This permit incorporates all applicable terms and conditions of prior air quality permits issued by the Idaho Department of Environmental Quality for the permitted source, unless the permittee emits toxic pollutants subject to state-only requirements pursuant to IDAPA 58.01.01.210, and the permittee elects not to incorporate those terms and conditions into this operating permit.

The effective date of this permit is the date of signature by the Department on the cover page.

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

**DATE ISSUED:** December 12, 2002

**DATE EXPIRES:** December 12, 2005

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## LIST OF ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

acfm	actual cubic feet per minute
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
Btu/lb	British thermal units per pound
CAA	Clean Air Act
CaO	calcium oxide
CFR	Code of Federal Regulations
CO	carbon monoxide
Department	Department of Environmental Quality
EPA	U.S. Environmental Protection Agency
gpm	gallons per minute
gr	grains (7,000 grains = 1 pound)
gr/dscf	grains per dry standard cubic foot
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pounds per hour
mg/l	milligrams per liter
MMBtu/hr	million British thermal units per hour
NO <sub>x</sub>	oxides of nitrogen
NSPS	New Source Performance Standards
O <sub>2</sub>	oxygen
O&M	operations and maintenance
PM	particulate matter
PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppmvd	parts per million by volume on a dry basis
psig	pounds per square inch gauge
PTC	permit to construct
PW	process weight
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SO <sub>2</sub>	sulfur dioxide
TASCO	The Amalgamated Sugar Company
T/hr	tons per hour
TDS	total dissolved solids
U.S.C.	United States Code
UTM	Universal Transverse Mercator
VOC	volatile organic compounds

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**1. FACILITY-WIDE CONDITIONS**

Table 1.1 summarizes the facility-wide requirements that generally apply to emissions units at the facility.

**Table 1.1 APPLICABLE REQUIREMENTS SUMMARY**

<b>Permit Conditions</b>	<b>Parameter</b>	<b>Permit Limit/ Standard Summary</b>	<b>Applicable Regulatory Requirement</b>	<b>Monitoring and Recordkeeping Requirements</b>
1.1	Fugitive emissions	Reasonable control	IDAPA 58.01.01.650-651	1.2, 1.3, 1.4, 1.11
1.5	Odors	Reasonable control	IDAPA 58.01.01.775-776	1.6, 1.11
1.7	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	1.8, 1.11
1.9	Excess emissions	Compliance with IDAPA 58.01.01.130-136	IDAPA 58.01.01.130-136	1.9-1.9.5, 1.11
1.12	Open burning	Compliance with IDAPA 58.01.01.600-616	IDAPA 58.01.01.600-616	1.11
1.13	Renovation or demolition	Compliance with 40 CFR 61, Subpart M	40 CFR 61, Subpart M	1.11
1.14	Chemical accidental release	Compliance with 40 CFR 68	40 CFR 68	1.11
1.15	Air quality standards	EPA reference test methods	IDAPA 58.01.01.157	1.11, 1.20
1.16	Fuel oil sulfur content limit	ASTM Grade 1 fuel oil – 0.3% by weight; ASTM Grade 2 fuel oil – 0.5% by weight	IDAPA 58.01.01.728	1.16.1, 1.11
1.17	Coal sulfur content limit	Any coal – 1% by weight	IDAPA 58.01.01.729	1.17.1, 1.11
1.18, 1.19	Fuel-burning equipment	Compliance with IDAPA 58.01.01.676-677	IDAPA 58.01.01.676-677	1.11
1.20	Criteria air pollutants, opacity	Compliance testing	IDAPA 58.01.01.157	1.11, 1.15

***Fugitive Emissions***

1.1 All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651.

**[IDAPA 58.01.01.650-651, 5/1/94]**

1.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (e.g., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.

**[IDAPA 58.01.01.322.06, 07, 5/1/94]**

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- 1.3 The permittee shall maintain records of all fugitive emissions complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

- 1.4 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 emissions 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 are present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

### **Odors**

- 1.5 No person shall allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

[IDAPA 58.01.01.775-776, 5/1/94]

- 1.6 The permittee shall maintain records of all odor complaints received. If a complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, 07 (state-only), 5/1/94]

### **Visible Emissions**

- 1.7 No person shall discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gases are the only reason(s) for the failure of the emission to comply with the requirements of this section.

[IDAPA 58.01.01.625, 4/5/00]

- 1.8 The permittee shall conduct a monthly facility-wide inspection of potential sources of visible emissions that are not covered by Permit Conditions 2.6, 3.7, and 4.6 during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see evaluation for each potential source. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each monthly visible emission inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment

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of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

**[IDAPA 58.01.01.322.06, 07 (state-only), 5/1/94]**

**Excess Emissions**

1.9 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions. The provisions of IDAPA 58.01.01.130-136 shall govern in the event of conflicts between Permit Condition 1.9 and the regulations of IDAPA 58.01.01.130-136.

1.9.1 The person responsible for, or in charge of, a facility during an excess emissions event shall, with all practicable speed, initiate and complete appropriate and reasonable action to correct the conditions causing the excess emissions events, to reduce the frequency of occurrence of such events, and to minimize the amount by which the emission standard is exceeded. In addition, this person shall, as provided below or upon request of the Department, submit a full report of such occurrence including a statement of all known causes and of the scheduling and nature of the actions to be taken.

**[IDAPA 58.01.01.132, 4/5/00]**

1.9.2 In all cases where startup, shutdown, or scheduled maintenance of any equipment or emissions unit is expected to result or results in an excess emissions event, the owner or operator of the facility or emissions unit generating the excess emissions shall demonstrate compliance with IDAPA 58.01.01.133.01(a) through (d), including, but not limited to the following:

**[IDAPA 58.01.01.133, 4/5/00]**

- Prohibiting any scheduled startup, shutdown, or maintenance resulting in excess emissions during any period in which an Atmospheric Stagnation Advisory and/or a Wood Stove Curtailment Advisory has been declared by the Department.

**[IDAPA 58.01.01.133.01.a, 3/20/97]**

- Notifying the Department of an excess emissions event as soon as reasonably possible, but no later than two hours prior to the start of the excess emissions event unless the owner or operator demonstrates to the Department's satisfaction that a shorter advanced notice was necessary.

**[IDAPA 58.01.01.133.01.b, 4/5/00]**

- Reporting and recording the information required pursuant to Permit Conditions 1.9.4 and 1.9.5 and IDAPA 58.01.01.135 and 136 for each excess emissions event due to startup, shutdown, or scheduled maintenance.

**[IDAPA 58.01.01.133.01.c, 3/20/97]**

1.9.3 In all cases where upset or breakdown of equipment or an emissions unit, or the initiation of safety measures, results or may result in an excess emissions event, the owner or operator of the facility or emissions unit generating the excess emissions shall demonstrate compliance with IDAPA 58.01.01.134.01(a) and (b) and the following:

**[IDAPA 58.01.01.134, 4/5/00]**

1.9.3.1 For all equipment or emissions units from which excess emissions result during upset or breakdown conditions, or for other situations that may necessitate the implementation of safety measures that cause excess emissions, the facility owner or operator shall comply with the following:

**[IDAPA 58.01.01.134.02, 4/5/00]**

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- The owner or operator shall immediately undertake all appropriate measures to reduce and, to the extent possible, eliminate excess emissions resulting from the event and to minimize the impact of such excess emissions on the ambient air quality and public health.

[IDAPA 58.01.01.134.02.a, 4/5/00]

- The owner or operator shall notify the Department of any upset, breakdown, or safety event that results in excess emissions. Such notification shall identify the time, specific location, equipment or emissions unit involved, and (to the extent known) the cause(s) of the occurrence. The notification shall be given as soon as reasonably possible, but no later than 24 hours after the event, unless the owner or operator demonstrates to the Department's satisfaction that the longer reporting period was necessary.

[IDAPA 58.01.01.134.02.b, 4/5/00]

- The owner or operator shall report and record the information required pursuant to Permit Conditions 1.9.4 and 1.9.5 and IDAPA 58.01.01.135 and 136 for each excess emissions event caused by an upset, breakdown, or safety measure.

[IDAPA 58.01.01.134.02.c, 3/20/97]

1.9.3.2 During any period of excess emissions caused by upset, breakdown, or operation under facility safety measures, the Department may require the owner or operator to immediately reduce or cease operation of the equipment or emissions unit causing the excess emissions until such time as the condition causing the excess emissions has been corrected or brought under control. Such action by the Department shall be taken upon consideration of the factors listed in IDAPA 58.01.01.134.03 and after consultation with the facility owner or operator.

[IDAPA 58.01.01.134.03, 4/5/00]

1.9.4 The owner or operator shall submit a written report for each excess emissions event to the Department no later than 15 days after the beginning of such an event. Each report shall contain the information specified in IDAPA 58.01.01.135.02.

[IDAPA 58.01.01.135.01, 02, 3/20/97; IDAPA 58.01.01.135.03, 4/5/00]

1.9.5 The owner or operator shall maintain excess emissions records at the facility for the most recent five-calendar-year period. The excess emissions records shall be made available to the Department upon request. The excess emissions records shall include the information required by IDAPA 58.01.01.136.03(a) and (b), as summarized in the following:

[IDAPA 58.01.01.136.01, 02, 3/20/97; IDAPA 58.01.01.136.03, 4/5/00]

- An excess emissions record book for each emissions unit or piece of equipment containing copies of all reports that have been submitted to the Department pursuant to IDAPA 58.01.01.135 for the particular emissions unit or equipment; and

[IDAPA 58.01.01.136.03.a, 4/5/00]

- Copies of all startup, shutdown, and scheduled maintenance procedures and upset/breakdown/ safety preventative maintenance plans that have been developed by the owner or operator in accordance with IDAPA 58.01.01.133 and 134, and facility records as necessary to demonstrate compliance with such procedures and plans.

[IDAPA 58.01.01.136.03.b, 3/20/97]

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### **Reports and Certifications**

- 1.10 All periodic reports and certifications required by this permit shall be submitted to the Department within 45 days of the end of each specified reporting period. Excess emissions reports and notifications shall be submitted in accordance with IDAPA 58.01.01.130-136. The annual reporting period for the permittee starts on September 1 of each year and ends on August 31 of the next calendar year. The semiannual reporting periods for the permittee will be September 1 through February 28 (or 29 in a leap year) and March 1 through August 31. Reports, certifications, and notifications shall be submitted to:

Department of Environmental Quality  
Twin Falls Regional Office  
Air Quality Permit Compliance  
601 Pole Line Rd., Suite 2  
Twin Falls, Idaho 83301  
Tel.: (208) 736-2190      Fax: (208) 736-2194

The periodic compliance certification required by permit General Provision 14.21 shall also be submitted within 45 days of the end of the specified reporting period to:

EPA Region 10  
Air Operating Permits, OAQ-107  
1200 Sixth Avenue  
Seattle, WA 98101

[IDAPA 58.01.01.322.08, 11, 4/5/00]

### **Monitoring and Recordkeeping**

- 1.11 The permittee shall maintain sufficient recordkeeping to assure compliance with all of the terms and conditions of this operating permit. Recording of monitoring information shall include, but not be limited to: (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, 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 Department representatives upon request.

[IDAPA 58.01.01.322.07, 5/1/94]

### **Open Burning**

- 1.12 The facility shall comply with the requirements of IDAPA 58.01.01.600-616, *Rules for Control of Open Burning*.

[IDAPA 58.01.01.600-616, 4/5/00]

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**Renovation and Demolition**

1.13 The permittee shall comply with all applicable portions of 40 CFR 61, Subpart M when conducting any renovation or demolition activities at the facility.

**[40 CFR 61, Subpart M]**

**Regulated Substances for Accidental Release Prevention**

1.14 An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, shall comply with the requirements of the Chemical Accident Prevention Provisions in 40 CFR 68 no later than the latest of the following dates:

- Three years after the date on which a regulated substance present above a threshold quantity is first listed under 40 CFR 68.130.
- The date on which a regulated substance is first present above a threshold quantity in a process.

**[40 CFR 68.10(a)]**

**Test Methods**

1.15 If testing is required, the permittee shall use the test methods listed in Table 1.2 to measure the pollutant emissions.

**Table 1.2 EPA REFERENCE TEST METHODS**

<b>Pollutants</b>	<b>Test Methods*</b>	<b>Special Conditions</b>
PM	EPA Method 5	
	EPA Method 5B for B&W Coal-fired Boiler and Erie City Boiler while fired by coal only	
PM <sub>10</sub>	EPA Method 201.a. and EPA Method 202	
NO <sub>x</sub>	EPA Method 7	
SO <sub>2</sub>	EPA Method 6	
CO	EPA Method 10	
VOC	EPA Method 25	
Opacity	EPA Method 9	Sources subject to NSPS use IDAPA 58.01.01.625 and Method 9; otherwise, use IDAPA 58.01.01.625 only.

\* Or approved alternative in accordance with IDAPA 58.01.01.157

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**Sulfur Content**

1.16 No person shall sell, distribute, use, or make available for use any distillate fuel oil containing more than the following percentages of sulfur:

- ASTM Grade 1 fuel oil - 0.3% by weight
- ASTM Grade 2 fuel oil - 0.5% by weight

[IDAPA 58.01.01.728, 5/1/94]

1.16.1 The permittee shall maintain documentation of the actual sulfur content in percent by weight for each shipment of distillate fuel oil received. The documentation must identify the supplier of the fuel, the date of fuel delivery, the grade of distillate fuel, and the sulfur content in percent by weight.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

1.17 No person shall sell, distribute, use, or make available for use any coal containing greater than 1% sulfur by weight.

[IDAPA 58.01.01.729, 5/1/94; Permit No. 13-1020-0001-00, 3/19/81]

1.17.1 The permittee shall maintain documentation of the actual sulfur content in percent by weight for each shipment of coal received. The documentation must identify the supplier of the coal, the date of delivery, and the coal sulfur content in percent by weight.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

**Fuel-burning Equipment**

1.18 No person shall not discharge to the atmosphere from any fuel-burning equipment with a maximum rated input of 10 MMBtu/hr or more, and commencing operation on or after October 1, 1979, PM in excess of the concentrations shown in the following table:

**Table 1.3 FUEL-BURNING EQUIPMENT GRAIN-LOADING STANDARDS FOR NEW SOURCES**

Fuel Type	Allowable Particulate (gr/dscf)	Oxygen
Gas	.015	3%
Liquid	.050	3%
Coal	.050	8%
Wood Product	.080	8%

The effluent gas volume shall be corrected to the oxygen concentration shown.

[IDAPA 58.01.01.676, 5/1/94]

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1.19 A person shall not discharge to the atmosphere from any fuel-burning equipment in operation prior to October 1, 1979, or with a maximum rated input of less than 10 MMBtu/hr, PM in excess of the concentrations shown in Table 1.4.

**Table 1.4 FUEL-BURNING EQUIPMENT GRAIN-LOADING STANDARDS FOR MINOR AND EXISTING SOURCES**

Fuel Type	Allowable Particulate (gr/dscf)	Oxygen
Gas	.015	3%
Liquid	.050	3%
Coal	.100	8%
Wood Product	.200	8%

The effluent gas volume shall be corrected to the oxygen concentration shown.

**[IDAPA 58.01.01.677, 5/1/94]**

***Compliance Testing***

1.20 The permittee shall provide a notice of intent to test to the Department at least 15 days prior to the scheduled test unless a shorter time period has been provided in a permit, order, or consent decree, or the permittee has prior Department approval. The Department may, at its option, have an observer present at any emissions tests conducted on a source. The Department requests that such testing not be performed on weekends or state holidays.

All testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior Department approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by the Department for any testing deviations, the Department may determine that the testing does not satisfy the testing requirements. Therefore, prior to conducting any compliance test, the permittee is encouraged to submit in writing to the Department, at least 30 days in advance, the following for approval:

- The type of test method to be used
- Any extenuating or unusual circumstances regarding the proposed test
- The proposed schedule for conducting and reporting the test

Within 30 days following the date on which a compliance test required by this permit is concluded, the permittee shall submit to the Department a compliance test report for the respective test. The compliance test report shall include all process operating data collected during the test period as well as the test results, raw test data, and associated documentation, including any approved test protocol.

The proposed test date(s), test date rescheduling notice(s), compliance test report, and all other correspondence shall be sent to:

Air Quality Permit Compliance  
 Department of Environmental Quality  
 Twin Falls Regional Office  
 601 Pole Line Rd., Suite 2  
 Twin Falls, ID 83301

**[IDAPA 58.01.01.157, 4/5/00; IDAPA 58.01.01.322.06, 08.a, 09, 5/1/94]**

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**2. EMISSIONS UNITS GROUP 1 - B&W COAL-FIRED BOILER (P-B1)**

The following is a narrative description of the B&W coal-fired boiler, identified as emission point P-B1, regulated in this Tier I operating permit. This description is for informational purposes only.

The B&W boiler has a rated steam production capacity of 200,000 pounds of steam per hour. The boiler is a coal-fired stoker boiler, which produces 200 psi, 500°F, super-heated steam for power production and evaporation water for sugar beet juices. The B&W boiler, in conjunction with the Erie City boiler, provides steam for electricity and for sugar production processes in the main mill.

Table 2.1 describes the devices used to control emissions from the B&W coal-fired boiler.

**Table 2.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES**

<b>Emission Point Identification</b>	<b>Emissions Unit(s)/ Process(es)</b>	<b>Emissions Control Device(s)</b>
P-B1	B&W coal-fired boiler	One multiclone (A - B1A) and one spray-chamber scrubber (A - B1B) in series

Table 2.2 contains a summary of requirements that apply generally to the B&W boiler. Specific permit requirements are listed below Table 2.2.

**Table 2.2 APPLICABLE REQUIREMENTS SUMMARY FOR B&W BOILER**

<b>Permit Conditions</b>	<b>Parameter</b>	<b>Permit Limit/ Standard Summary</b>	<b>Applicable Regulatory Requirement</b>	<b>Monitoring and Recordkeeping Requirements</b>
2.1	PM	0.100 gr/dscf at 8% O <sub>2</sub>	IDAPA 58.01.01.677; Permit No. 13-1020-0001-00	2.4, 2.7, 2.8, 2.9, 2.10, 2.11
2.2	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625; Permit No. 13-1020-0001-00	2.6, 2.11

Table 2.3 contains a summary of requirements that apply to the B & W boiler's multiclone and spray-chamber scrubber.

**Table 2.3 APPLICABLE REQUIREMENTS SUMMARY FOR B&W BOILER CONTROL DEVICES**

<b>Control Device</b>	<b>Operating Parameter</b>	<b>Operating Range</b>	<b>Monitoring and Recordkeeping Requirements</b>
Multiclone	Pressure drop	2.5" of water column ± 20%	2.7, 2.8, 2.10
Spray-chamber scrubber	Water flow	500 to 650 gpm	2.7, 2.8, 2.9, 2.10
	TDS and suspended particulate	57,900 mg/l	

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*The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.*

**Permit Limits/Operating Requirements**

- 2.1 A person shall not discharge to the atmosphere from any fuel-burning equipment in operation prior to October 1, 1979, or with a maximum rated input of less than 10 MMBtu/hr, PM in excess of 0.100 gr/dscf corrected to 8% oxygen.  
**[IDAPA 58.01.01.677, 5/1/94; Permit No. 13-1020-0001-00, 3/19/81]**
- 2.2 The permittee shall comply with the visible emissions requirements listed in Permit Condition 1.7.  
**[IDAPA 58.01.01.625, 4/5/00; Permit No. 13-1020-0001-00, 3/19/81]**
- 2.3 Until the permittee has an O&M manual that is developed in accordance with Permit Condition 2.11, the permittee shall operate within the operating range for each control device operating parameter specified below. When the O&M manual becomes effective, the permittee shall operate each control device within the operating range specified in the approval O&M manual.
- The pressure drop across the multiclone shall be maintained within a range of 2.5 ± 20% inches of water column.
  - The water flow rate to the scrubber shall be maintained within the range of 500 to 650 gpm.
  - The concentration of suspended particulate and total dissolved solids (TDS) in the recirculated water shall not exceed 57,900 mg/l of water.
  - Whenever the water flow rate to the scrubber are not within the allowable operating ranges specified above, the permittee shall take corrective action as expeditiously as practicable to bring the scrubber water flow rate back to the allowable range.
  - Whenever the total concentration of suspended particulate and TDS in the recirculated water of the wet scrubber is above the allowable value, the permittee shall take corrective action as expeditiously as practicable to bring it below the allowable value. If no action can be taken practically, an explanation shall be provided with the report in accordance with Permit Condition 14.25.
  - Deviations from any operating range specified in Permit Condition 2.3 may not by themselves be considered deviations from applicable emissions standards unless the Department determines that the frequency, duration, or magnitude of the deviations indicates that additional action is required. Failure to take corrective action may be considered a violation of this permit condition, if appropriate. All deviations shall be reported in accordance with Permit Conditions 1.9 and 14.25.
- [IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]**

**Compliance Testing**

- 2.4 A compliance test shall be conducted within the first 12 months of this permit term to demonstrate compliance with Permit Condition 2.1. Testing shall be conducted in accordance with IDAPA 58.01.01.157, Permit Condition 1.20, and the following:
- The permittee shall conduct a PM compliance test using the test outlined in 40 CFR 60, Appendix A, Method 5B, or such comparable and equivalent method approved in accordance with IDAPA 58.01.01.157. Test methods and procedures shall comply with IDAPA 58.01.01.157.
  - Prior to conducting the test, the permittee shall address the required averaging period specified in accordance with IDAPA 58.01.01.679 and the altitude correction in IDAPA 58.01.01.680.

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- A visible emissions evaluation shall be performed during each compliance test. The visible emissions evaluation shall be conducted in accordance with the procedures contained in IDAPA 58.01.01.625.
- The permittee shall monitor and record the steam production rate of the boiler, coal feed rate in tons per hour, pressure drop across the multiclone, and water flow rate to the scrubber during each test.
- For the coal used during the source test, the permittee shall record the coal's highest heating value and coal's analysis result, including ash content.
- If the PM measured in the initial compliance test is less than or equal to 75% of the emission standard in Permit Condition 2.1, no further testing shall be required during this term of the permit. If the PM measured during the initial compliance test is greater than 75%, but less than or equal to 90%, of the emission standard in Permit Condition 2.1, a second test shall be required in the third year of the permit term. If the PM measured during the initial compliance test is greater than 90% of the emission standard in Permit Condition 2.1, the permittee shall conduct a compliance test annually.
- The permittee shall collect a representative sample of recirculated water from the scrubber during each test. The concentration of suspended particulate and TDS of the sample recirculated water shall be analyzed, recorded, and expressed in milligrams of solids per liter of water.
- The permittee shall record and maintain the information required under Permit Condition 2.4 in accordance with Permit Condition 1.11.

[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 09, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

2.5 The permittee may conduct additional compliance tests during the permit term to revise the operational parameters in Permit Condition 2.3 and/or parameters developed under Permit Conditions 2.4 and 2.11, so long as the compliance tests conform to all requirements of this permit.

[IDAPA 58.01.01.322.01, 3/19/99]

### ***Monitoring and Recordkeeping***

2.6 The permittee shall conduct weekly visible emissions inspections during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see evaluation for the boiler stack. If any visible emissions are present, the permittee shall perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each weekly visible emission inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

- During a week that a compliance test required by Permit Condition 2.4 is scheduled, the weekly visible emissions evaluation shall be performed during the compliance test. Results of the visible emissions evaluation shall be submitted with the compliance test report.

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- If four consecutive weekly visible emissions inspections indicate that visible emissions are not present, or opacity is below 20%, respectively, the frequency of visible emissions inspections decreases to monthly. If any monthly Method 9 observation indicates opacity is greater than 20%, the frequency of the visible emissions inspections reverts to weekly.

[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

- 2.7 The permittee shall install, operate, calibrate, and maintain monitoring devices to continuously measure the scrubber water flow rate and pressure drop across the multiclone. These operating parameters shall be recorded weekly and the records maintained in accordance with Permit Condition 1.11. In the event the monitoring device becomes inoperable, it shall be repaired or replaced as soon as practicable.

[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

- 2.8 At least once each year during a planned maintenance outage, or as needed during operation, the multiclone and the spray-chamber scrubber shall be inspected for physical degradation that could affect the performance of the control device. The permittee shall make all necessary repairs to the multiclone and the scrubbers to ensure efficient operation.

[IDAPA 58.01.01.322.01 (state-only), 3/19/99]

- 2.9 The permittee shall collect a representative sample of recirculated water from the scrubber monthly from September to December and biweekly from January to the end of the campaign. The concentration of suspended particulate and TDS in the sample recirculated water shall be analyzed and recorded.

[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

- 2.10 All the records shall be recorded and maintained in accordance with Permit Condition 1.11. The permittee shall record the starting and ending dates of each campaign.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

### ***Operations and Maintenance Manual***

- 2.11 The permittee shall develop an initial O&M manual based on the results and operating parameters of the first- year compliance test that demonstrates compliance with this permit. This initial O&M manual shall be submitted to the Department for review and approval no later than 6 months after completion of the first-year compliance test that demonstrates compliance with this permit. The O&M manual is part of the terms and conditions of the permit.

- After approval of the initial O&M manual, the permittee shall update the control device monitoring program in the O&M manual after each compliance test. Each updated control device monitoring program in the O&M manual and corresponding compliance test report shall be submitted to the Department for review and approval. The permittee may update the O&M manual at any time during the permit term. The updated control device monitoring program in the O&M manual shall not become effective until approved by the Department. If the Department deems that the change in the O&M manual qualifies as significant permit modification as defined in IDAPA 58.01.01.382, the procedures specified in IDAPA 58.01.01.382 shall be followed to make the change.

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- The O&M manual shall address the operation, maintenance, and repair of the B&W boiler's multiclone and wet scrubber to ensure that they are in good working order and operate as efficiently as practicable. The manual shall include, at a minimum, a general description of the control devices; normal operating conditions and procedures; startup, shutdown, and maintenance procedures; upset conditions and corrective procedures; methods of preventing malfunctions; appropriate corrective actions to be taken; provisions for monthly inspections during regular operations; and provisions for annual inspections during planned maintenance outages. The permittee shall keep records of maintenance activities in accordance with Permit Condition 1.11.
- The O&M manual shall include a control device monitoring program that establishes control device operating parameters to be monitored, their acceptable operating ranges, corrective action levels, monitoring equipment and procedures, monitoring frequency, and frequency of recordkeeping. The monitoring parameters shall include, but are not limited to, parameters required to be recorded under Permit Conditions 2.3 unless the Department approves their removal from this permit condition. The control device-monitoring program shall be developed by the permittee based on compliance test results, vendor data, and other supporting documentation.
- The O&M manual shall be maintained onsite and made available to Department representatives upon request.
- Whenever an operating parameter is outside the operating range specified by the control device monitoring program in the O&M manual, the permittee shall take corrective action as expeditiously as practicable to bring the operating parameter back within the operating range. Deviations from the operating range may not by themselves be considered deviations from applicable emissions standards unless the Department determines that the frequency, duration, or magnitude of the deviations indicates that additional action is required. Failure to take corrective action may be considered a violation of this permit condition, if appropriate. All deviations shall be reported in accordance with the Permit Conditions 1.9 and 14.25.

[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94]

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**3. EMISSIONS UNITS GROUP 2 - ERIE CITY BOILER (P-B2A and P-B2B)**

The following is a narrative description of the Erie City boiler, identified as emission point S-B2, regulated in this Tier I operating permit. This description is for informational purposes only.

The Erie City boiler has a rated steam production capacity of 200,000 pounds of steam per hour when fired with coal and 250,000 pounds of steam per hour when fired with natural gas. The Erie City boiler is a coal pulverized/natural gas, horizontally-fired boiler that produces 400 psi, 600°F, super-heated steam for power production and evaporation water for sugar beet juices.

Table 3.1 describes the control devices used to control emissions from the Erie City boiler.

**Table 3.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES**

<b>Emission Point Identification</b>	<b>Emissions Unit(s)/ Process(es)</b>	<b>Emissions Unit(s)/ Process(es)</b>	<b>Emission Control Device</b>
P-B2A	200,000 pounds steam per hour boiler when fired with coal	Boiler (S-B2) while fired with coal, or the combination of coal and natural gas	One multiclone (A - B2A) and one spray-chamber (A - B2B) scrubber in series
P-B2B	250,000 pounds steam per hour boiler when fired with natural gas	Boiler (S-B2) while fired by natural gas only	Multiclone (A - B2A)

Table 3.2 contains a summary of requirements that apply generally to the Erie City boiler. Specific permit requirements are listed below Table 3.2.

**Table 3.2 APPLICABLE REQUIREMENTS SUMMARY FOR EMISSIONS UNIT**

<b>Permit Conditions</b>	<b>Affected Emission Point</b>	<b>Parameter</b>	<b>Permit Limit/ Standard Summary</b>	<b>Applicable Regulatory Requirement</b>	<b>Monitoring and Recordkeeping Requirements</b>
3.1	<u>P-B2A</u> (while the boiler is fired with coal, or the combination of coal and natural gas)	PM	0.100* X + 0.011 *Y at 8% O <sub>2</sub>	IDAPA 58.01.01.677-678; Permit No. 13-1020-0001-00	3.2, 3.4, 3.5, 3.10, 3.12
	<u>P-B2B</u> (while the boiler is fired by natural gas only)	PM	0.015 gr/dscf at 3% O <sub>2</sub>	IDAPA 58.01.01.677	3.2, 3.4, 3.5, 3.12
3.3	P-B2A and P-B2B	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625; Permit No. 13-1020-0001-00	3.7

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Table 3.3 contains a summary of requirements that apply to Erie City boiler's multiclone and spray-chamber scrubber. Specific permit requirements are listed below.

**Table 3.3 APPLICABLE REQUIREMENTS SUMMARY FOR EMISSIONS CONTROL DEVICES**

Control Device	Operating Parameter	Operating Range	Monitoring
Multiclone	Pressure drop	5.8" of water column ± 20%	3.8, 3.9, 3.12
Spray-chamber scrubber	Water flow	700 to 950 gpm	3.8, 3.9, 3.10, 3.12
	TDS and suspended particulate	57,900 mg/l	

**Permit Limits/Operating Requirements**

3.1 A person shall not discharge to the atmosphere from any fuel-burning equipment in operation prior to October 1, 1979, or with a maximum rated input of less than 10 MMBtu/hr, PM in excess of the concentrations shown in Table 3.4. The effluent gas volume shall be corrected to the oxygen concentration shown.

**Table 3.4 FUEL-BURNING EQUIPMENT GRAIN-LOADING STANDARDS**

Fuel Type	Allowable Particulate Emissions	Percent Oxygen
Coal, or the combination of coal and natural gas	0.100* X + 0.011 *Y <sup>1</sup>	8%
Gas only	0.015 gr/dscf	3%

<sup>1</sup> X is the percentage of total heating input derived from the combustion of coal; Y is the percentage of total heating input derived from the combustion of natural gas.

When two or more types of fuel are burned concurrently, the allowable emission shall be determined by proportioning the gross heat input and emission standards for each fuel.

**[IDAPA 58.01.01.677, 678, 5/1/94; Permit No. 13-1020-0001-00, 3/19/81]**

3.2 The permittee shall monitor and record the boiler fuel type whenever the fuel type is changed. The records shall be maintained in accordance with Permit Condition 1.11. Fuel type in this section means natural gas only, coal only, or the combination of natural gas and coal.

**[IDAPA 58.01.01.322.06, 07, 5/1/94]**

3.3 The permittee shall comply with the visible emissions requirements listed in Permit Condition 1.7.

**[IDAPA 58.01.01.625, 4/5/00; Permit No. 13-1020-0001-00, 3/19/81]**

3.4 Until the permittee has an O&M manual that is developed in accordance with Permit Condition 3.12, the permittee shall operate within the operating range for each control device operating parameter specified below. When the O&M manual becomes effective, the permittee shall operate each control device within the operating range specified in the approval O&M manual.

- The pressure drop across the multiclone shall be maintained within the range 5.8 ± 20% inches of water column.
- The water flow rate to the scrubber shall be maintained within the range from 700 to 950 gpm.

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- The concentration of suspended particulate and TDS in the recirculated water shall not exceed 57,900 mg/l of water.
- Whenever the water flow rate to the scrubber are not within the allowable operating ranges specified above, the permittee shall take corrective action as expeditiously as practicable to bring the scrubber water flow rate back to the allowable range.
- Whenever the total concentration of suspended particulate and TDS in the recirculated water of the wet scrubber is above the allowable value, the permittee shall take corrective action as expeditiously as practicable to bring it below the allowable value. If no action can be taken practically, an explanation shall be provided with the report in accordance with Permit Condition 14.25.
- Deviations from any operating range specified in Permit Condition 3.4 may not by themselves be considered deviations from applicable emissions standards unless the Department determines that the frequency, duration, or magnitude of the deviations indicates that additional action is required. Failure to take corrective action may be considered a violation of this permit condition, if appropriate. All deviations shall be reported in accordance with Permit Conditions 1.9 and 14.25.

[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

### **Compliance Testing**

3.5 A compliance test shall be conducted within the first 12 months of this permit term to demonstrate compliance with Permit Condition 3.1. Testing shall be conducted in accordance with IDAPA 58.01.01.157, Permit Condition 1.20, and the following:

- The permittee shall conduct a PM compliance test using the test outlined in 40 CFR 60, Appendix A, Method 5B, or such comparable and equivalent method approved in accordance with IDAPA 58.01.01.157. Test methods and procedures shall comply with IDAPA 58.01.01.157.
- Prior to conducting the test, the permittee shall address the required averaging period specified in accordance with IDAPA 58.01.01.679 and the altitude correction in IDAPA 58.01.01.680.
- A visible emissions evaluation shall be performed during each compliance test. The visible emissions evaluation shall be conducted in accordance with the procedures contained in IDAPA 58.01.01.625.
- The permittee shall monitor and record the steam production rate of the boiler, coal feed rate in tons per hour, pressure drop across the multiclone, and water flow rate to the scrubber during each test.
- For the coal used during the source test, the permittee shall record the coal's highest heating value and coal's analysis result, including ash content.
- If the PM measured in the initial compliance test is less than or equal to 75% of the emission standards in Permit Condition 3.1, no further testing shall be required during this term of the permit. If the PM measured during the initial compliance test is greater than 75%, but less than or equal to 90%, of the emission standards in Permit Condition 3.1, a second test shall be required in the third year of the permit term. If the PM measured during the initial compliance test is greater than 90% of the emission standards in Permit Condition 3.1, the permittee shall conduct a compliance test annually.
- The permittee shall collect a representative sample of recirculated water from the scrubber during each test. The concentration of suspended particulate and TDS of the sample recirculated water shall be analyzed, recorded, and expressed in milligrams of solids per liter of water.
- The permittee shall record and maintain the information required under Permit Condition 3.5 in accordance with Permit Condition 1.11.

[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 09, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

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- 3.6 The permittee may conduct additional compliance tests during the permit term to revise the operational parameters in Permit Condition 3.4 and/or parameters developed under Permit Conditions 3.5 and 3.12, so long as the compliance tests conform to all requirements of this permit.

[IDAPA 58.01.01.322.01, 3/19/99]

### ***Monitoring and Recordkeeping***

- 3.7 When combusting coal only, or any combination of coal and natural gas, the permittee shall conduct weekly visible emissions inspections during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see evaluation for the boiler stack(s). If any visible emissions are present, the permittee shall perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each weekly visible emission inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

- During a week that a compliance test required by Permit Condition 3.5 is scheduled, the weekly visible emissions evaluation shall be performed during the compliance test. Results of the visible emissions evaluation shall be submitted with the compliance test report.
- If four consecutive weekly visible emissions inspections indicate that visible emissions are not present, or opacity is below 20%, respectively, the frequency of visible emissions inspections decreases to monthly. If any monthly Method 9 observation indicates opacity is greater than 20%, the frequency of the visible emissions inspections reverts to weekly.

[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

- 3.8 The permittee shall install, operate, calibrate, and maintain monitoring devices to continuously measure the scrubber water flow rate and pressure drop across the multiclone. These operating parameters shall be recorded weekly and the records maintained in accordance with Permit Condition 1.11. In the event the monitoring device becomes inoperable, it shall be repaired or replaced as soon as practicable.

[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

- 3.9 At least once each year during a planned maintenance outage, or as needed during operation, the multiclone and the spray-chamber scrubber shall be inspected for physical degradation that could affect the performance of the control device. The permittee shall make all necessary repairs to the multiclone and the scrubbers to ensure efficient operation.

[IDAPA 58.01.01.322.01 (state-only), 3/19/99]

- 3.10 The permittee shall collect a representative sample of recirculated water from the scrubber monthly from September to December and biweekly from January to the end of the campaign. The concentration of suspended particulate and TDS in the sample recirculated water shall be analyzed and recorded.

[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

- 3.11 All the records shall be recorded and maintained in accordance with Permit Condition 1.11. The permittee shall record the starting and ending dates of each campaign.

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[IDAPA 58.01.01.322.06, 07, 5/1/94]

***Operations and Maintenance Manual***

- 3.12 The permittee shall develop an initial O&M manual based on the results and operating parameters of the first- year compliance test that demonstrates compliance with this permit. This initial O&M manual shall be submitted to the Department for review and approval no later than 6 months after completion of the first-year compliance test that demonstrates compliance with this permit. The O&M manual is part of the terms and conditions of the permit.
- After approval of the initial O&M manual, the permittee shall update the control device monitoring program in the O&M manual after each compliance test. Each updated control device monitoring program in the O&M manual and corresponding compliance test report shall be submitted to the Department for review and approval. The permittee may update the O&M manual at any time during the permit term. The updated control device monitoring program in the O&M manual shall not become effective until approved by the Department. If the Department deems that the change in the O&M manual qualifies as significant permit modification as defined in IDAPA 58.01.01.382, the procedures specified in IDAPA 58.01.01.382 shall be followed to make the change.
  - The O&M manual shall address the operation, maintenance, and repair of the Erie City boiler's multiclone and wet scrubber to ensure that they are in good working order and operate as efficiently as practicable. The manual shall, at a minimum, include a general description of the control devices; normal operating conditions and procedures; startup, shutdown, and maintenance procedures; upset conditions and corrective procedures; methods of preventing malfunctions; appropriate corrective actions to be taken; provisions for monthly inspections during regular operations; and provisions for annual inspections during planned maintenance outages. The permittee shall keep records of maintenance activities in accordance with Permit Condition 1.11.
  - The O&M manual shall include a control device monitoring program that establishes control device operating parameters to be monitored, their acceptable operating ranges, corrective action levels, monitoring equipment and procedures, monitoring frequency, and frequency of recordkeeping. The monitoring parameters shall include, but are not limited to, parameters required to be recorded under Permit Conditions 3.4 unless the Department approves their removal from this permit condition. The control device-monitoring program shall be developed by the permittee based on compliance test results, vendor data, and other supporting documentation.
  - The O&M manual shall be maintained onsite and made available to Department representatives upon request.
  - Whenever an operating parameter is outside the operating range specified by the control device monitoring program in the O&M manual, the permittee shall take corrective action as expeditiously as practicable to bring the operating parameter back within the operating range. Deviations from the operating range may not by themselves be considered deviations from applicable emissions standards unless the Department determines that the frequency, duration, or magnitude of the deviations indicates that additional action is required. Failure to take corrective action may be considered a violation of this permit condition, if appropriate. All deviations shall be reported in accordance with the Permit Conditions 1.9 and 14.25.

[[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94]

**AIR QUALITY TIER I OPERATING PERMIT NUMBER: 067-00001**

**Permittee:** The Amalgamated Sugar Company, LLC      **Date Issued:** December 12, 2002  
**Location:** Paul, Idaho      **Date Expires:** December 12, 2005

*The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.*

**4. EMISSIONS UNITS GROUP 3 - PULP DRYING (P-D1A, P-D1B, P-D2A, P-D2B)**

The following is a narrative description of the pulp dryers regulated in this Tier I operating permit. This description is for informational purposes only.

Emissions Unit Group 3 consists of the South pulp dryer and North pulp dryer. These are two direct-fired pulp dryers used to dry pressed beet pulp. The two dryers are primarily coal-fired. Exhaust gasses from each dryer split into two streams. Each stream passes through a cyclone and a spray-impingement-type scrubber in series.

Table 4.1 describes the control devices used in controlling emissions from the pulp dryers.

**Table 4.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES**

<b>Emission Point Identification</b>	<b>Emissions Unit(s) / Process(es)</b>	<b>Emission Control Device</b>
P-D1A	48.5 tons per hour process weight input rate south pulp dryer (S-D1)	A pair of cyclones (A - D1A) operated in parallel and then exhausted to a pair of spray-impingement-type scrubbers (A - D1B) operated in parallel
P-D1B		
P-D2A	56.9 tons per hour process weight input rate north pulp dryer (S-D2)	A pair of cyclones (A - D2A) operated in parallel and then exhausted to a pair of spray-impingement-type scrubbers (A - D2B) operated in parallel
P-D2B		

The following table contains a summary of requirements that generally apply to the pulp dryers. Specific permit requirements are listed below Table 4.2.

**TABLE 4.2 APPLICABLE REQUIREMENTS SUMMARY FOR PULP DRYERS**

<b>Permit Conditions</b>	<b>Affected Emissions Unit</b>	<b>Parameter</b>	<b>Permit Limit/ Standard Summary</b>	<b>Applicable Regulatory Requirement</b>	<b>Monitoring and Recordkeeping Requirements</b>
4.1	Each scrubber of each dryer	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625; Permit No. 1020-0001	4.4, 4.6, 4.12
4.2	South pulp dryer	PM	Process weight	IDAPA 58.01.01.703	4.4, 4.7, 4.12
	North pulp dryer				

Table 4.3 contains a summary of requirements that apply to each dryer's scrubber. Specific permit requirements are listed below.

**Table 4.3 APPLICABLE REQUIREMENTS SUMMARY FOR CONTROL DEVICES**

<b>Control Device</b>	<b>Operating Parameter</b>	<b>Operating Range</b>	<b>Monitoring and Recording Requirements</b>
Each scrubber	Pressure drop	5" to 8" of water column	4.8, 4.11, 4.12
	Water flow	100 to 300 gpm	

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	Concentration of TDS and suspended particulate in the scrubber's recirculated water	34,000 mg/l	4.9, 4.12
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**Permit Limits/Operating Requirements**

- 4.1 The permittee shall comply with visible emissions requirements specified in Permit Condition 1.7.  
**[IDAPA 58.01.01.625, 4/5/00; Permit No. 1020-0001, 1/1/84]**
- 4.2 No person with process exempt under IDAPA 58.01.01.702.02.b shall emit particulate matter to the atmosphere from any process or process equipment in excess of the amount shown in the following equations, where E is the total rate of emission from all emission points from the source in pounds per hour, and PW is the process weight rate in pounds per hour. The averaging period for this limit is one hour in accordance with IDAPA 58.01.01.700.03.
- a. If PW is less than 60,000 lb/hr,
- $$E = 0.02518(PW)^{0.67}$$
- b. If PW is greater than or equal to 60,000 lb/hr,
- $$E = 23.84(PW)^{0.11} - 40$$
- [IDAPA 58.01.01.700.03, 4/5/00; IDAPA 58.01.01.702.02.b, 5/1/94; IDAPA 58.01.01.703, 11/13/98; Permit No. 1020-0001, 1/1/84]**
- 4.3 Until the permittee has an O&M manual that is developed in accordance with Permit Condition 4.12, the permittee shall operate within the operating range for each control device operating parameter specified below. When the O&M manual becomes effective, the permittee shall operate each control device within the operating range specified in the approval O&M manual.
- The water flow of each scrubber shall be maintained within the range from 100 to 300 gpm.
  - The pressure drop across each scrubber shall be maintained within a range from 5 to 8 inches of water column.
  - The concentration of suspended particulate and TDS in the recirculated water shall not exceed 34,000 mg/l of water.
  - Whenever the water flow rate to the scrubber are not within the allowable operating ranges specified above, the permittee shall take corrective action as expeditiously as practicable to bring the scrubber water flow rate back to the allowable range.
  - Whenever the total concentration of suspended particulate and TDS in the recirculated water of the wet scrubber is above the allowable value, the permittee shall take corrective action as expeditiously as practicable to bring it below the allowable value. If no action can be taken practically, an explanation shall be provided with the report in accordance with Permit Condition 14.25.
  - Deviations from any operating range specified in Permit Condition 4.3 may not by themselves be considered deviations from applicable emissions standards unless the Department determines that the frequency, duration, or magnitude of the deviations indicates that additional action is required. Failure

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to take corrective action may be considered a violation of this permit condition, if appropriate. All deviations shall be reported in accordance with Permit Conditions 1.9 and 14.25.

**[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]**

### **Compliance Testing**

4.4 A compliance test shall be conducted within the first 12 months of this permit term to demonstrate compliance with Permit Conditions 4.1 and 4.2. Testing shall be conducted in accordance with IDAPA 58.01.01.157, Permit Condition 1.20, and the following:

- The permittee shall conduct a PM compliance test using the test outlined in 40 CFR 60, Appendix A, Method 5, or such comparable and equivalent method approved in accordance with IDAPA 58.01.01.157. Test methods and procedures shall comply with IDAPA 58.01.01.157.
- A visible emissions evaluation shall be performed during each compliance test. The visible emissions evaluation shall be conducted in accordance with the procedures contained in IDAPA 58.01.01.625.
- For each pulp dryer, the process weight input (tons per hour) shall be calculated using the methodology described in Appendix A of this permit, *Pulp Dryer Material Input Rate Calculation*, or as otherwise approved in writing by the Department. Parameters and operating data used to calculate the process weight input must also be recorded for each compliance test run. These parameters and operating data include total dried pulp produced (tons per day), dried pulp moisture content (percent by weight), pressed pulp moisture content (percent by weight), fuel heating value (Btu/lb), fuel input per ton of dried pulp (therms per ton), quantity of additives (percent of dry substance per ton of dry pulp), solids content of the additives, and throughput to each dryer (percent).
- The permittee shall collect a representative sample of recirculated water from the scrubber during each compliance test. The total concentration of total dissolved solids and suspended solids of the recirculated water sample shall be analyzed and recorded and expressed in microgram solids per liter of water.
- For each scrubber, the permittee shall record the pressure drop across the scrubber, water flow of the scrubber, and water pressure of sprays.
- If the PM measured during in the initial compliance test is less than or equal to 75% of the emission standards in Permit Condition 4.2, no further testing shall be required during this term of this permit. If the PM measured during the initial compliance test is greater than 75%, but less than or equal to 90%, of the emission standard in Permit Condition 4.2, a second test shall be required in the third year of the permit term. If the PM measured during the initial compliance test is greater than 90% of the emission standard in Permit Condition 4.2, the permittee shall conduct a compliance test annually.
- The permittee shall record and maintain information required under Permit Condition 4.4 in accordance with Permit Condition 1.11.

**[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]**

4.5 The permittee may conduct additional compliance tests during the permit term to revise the operational parameters in Permit Condition 4.3 and/or parameters developed under Permit Conditions 4.4 and 4.12, so long as the compliance tests conform to all requirements of this permit.

**[IDAPA 58.01.01.322.01, 3/19/99]**

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**Monitoring and Recordkeeping Requirements**

- 4.6 The permittee shall conduct weekly visible emissions observations during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see evaluation for dryer stacks. If any visible emissions are present, the permittee shall perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each weekly visible emission inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.
- During a week that a compliance test required by Permit Condition 3.5 is scheduled, the weekly visible emissions evaluation shall be performed during the compliance test. Results of the visible emissions evaluation shall be submitted with the compliance test report.
  - If four consecutive weekly visible emissions inspections indicate that visible emissions are not present, or opacity is below 20%, respectively, the frequency of visible emissions inspections decreases to monthly. If any monthly Method 9 observation indicates opacity is greater than 20%, the frequency of the visible emissions inspections reverts to weekly.  
[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]
- 4.7 The permittee shall record the process weight input rate for each dryer monthly. It shall be calculated in accordance with the Pulp Dryer Throughput Calculation Spreadsheet in the appendix of this permit, or as otherwise approved in writing by the Department.  
[IDAPA 58.01.01.322.06, 07, 5/1/94, IDAPA 58.01.01.322.08, 4/5/00; Permit No. 1480-0001, 01/01/84]
- 4.8 The permittee shall install, operate, calibrate, and maintain monitoring devices to continuously measure the scrubber water flow rate and pressure drop across the scrubber. The flow rate and pressure drop shall be recorded weekly and the records maintained in accordance with Permit Condition 1.11. In the event the monitoring device(s) becomes inoperable, it/they shall be repaired or replaced as soon as practicable.  
[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94]
- 4.9 The permittee shall collect a representative sample of recirculated water from the scrubber monthly from September to December and biweekly from January to the end of each campaign. The concentration of suspended particulate and total dissolved solids in the recirculated water sample shall be analyzed and recorded. The result shall be expressed in microgram solids per liter of water.  
[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94]
- 4.10 All the records shall be recorded and maintained in accordance with Permit Condition 1.11. The permittee shall record the starting and ending dates of each campaign.  
[IDAPA 58.01.01.322.06, 07, 5/1/94]

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- 4.11 At least once each year during a planned maintenance outage, or as needed during operation, each cyclone and scrubber shall be inspected for physical degradation that could affect the performance of the control device. The permittee shall make all necessary repairs to cyclone(s) and scrubber(s) to ensure efficient operation.

[IDAPA 58.01.01.322.01, 03/19/99]

### ***Operations and Maintenance Manual***

- 4.12 The permittee shall develop an initial O&M manual based on the results and operating parameters of the first- year compliance test that demonstrates compliance with this permit. This initial O&M manual shall be submitted to the Department for review and approval no later than 6 months after completion of the first-year compliance test that demonstrates compliance with this permit. The O&M manual is part of the terms and conditions of the permit.

- After approval of the initial O&M manual, the permittee shall update the control device monitoring program in the O&M manual after each compliance test. Each updated control device monitoring program in the O&M manual and corresponding compliance test report shall be submitted to the Department for review and approval. The permittee may update the O&M manual at any time during the permit term. The updated control device monitoring program in the O&M manual shall not become effective until approved by the Department. If the Department deems that the change in the O&M manual qualifies as significant permit modification as defined in IDAPA 58.01.01.382, the procedures specified in IDAPA 58.01.01.382 shall be followed to make the change.
- The O&M manual shall address the operation, maintenance, and repair of both dryers' cyclones and wet scrubbers to ensure that they are in good working order and operate as efficiently as practicable. The manual shall, at a minimum, include a general description of the control devices; normal operating conditions and procedures; startup, shutdown, and maintenance procedures; upset conditions and corrective procedures; methods of preventing malfunctions; appropriate corrective actions to be taken; provisions for monthly inspections during regular operations; and provisions for annual inspections during planned maintenance outages. The permittee shall keep records of maintenance activities in accordance with Permit Condition 1.11.
- The O&M manual shall include a control device monitoring program that establishes control device operating parameters to be monitored, their acceptable operating ranges, corrective action levels, monitoring equipment and procedures, monitoring frequency, and frequency of recordkeeping. The monitoring parameters shall include, but are not limited to, parameters required to be recorded under Permit Condition 4.3 unless the Department approves their removal from this permit condition. The control device-monitoring program shall be developed by the permittee based on compliance test results, vendor data, and other supporting documentation.
- The O&M manual shall be maintained onsite and made available to Department representatives upon request.

Whenever an operating parameter is outside the operating range specified by the control device monitoring program in the O&M manual, the permittee shall take corrective action as expeditiously as practicable to bring the operating parameter back within the operating range. Deviations from the operating range may not by themselves be considered deviations from applicable emissions standards unless the Department determines that the frequency, duration, or magnitude of the deviations indicates that additional action is required. Failure to take corrective action may be considered a violation of this Permit Condition, if appropriate. All deviations shall be reported in accordance with the Permit Conditions 1.9 and 14.25.

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[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94]

**5. EMISSIONS UNITS GROUP 4 - PELLET COOLING (P-D3, P-D4, P-D5)**

The following is a narrative description of the pellet cooling process regulated in this Tier I operating permit. This description is for informational purposes only.

The pellet coolers are all manufactured by California Pellet Mill (model 2GA3). Each pellet cooler is rated at 7.4 T/hr. Emissions from the pellet coolers consist of PM and PM<sub>10</sub>. The three pellet coolers' emissions are controlled by two cyclones.

Table 5.1 describes the devices used to control emissions from the pellet coolers.

**Table 5.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES**

<b>Emission Point Identification</b>	<b>Emissions Unit(s)/ Process(es)</b>	<b>Emission Control Device</b>
P-D3	Pellet cooler No. 1 (S-D3)	Cyclone A-D3
P-D4/5	Pellet cooler No. 2 (S-D4)	Cyclone A-D4/5
	Pellet cooler No. 3 (S-D5)	

Table 5.2 contains a summary of requirements that apply generally to pellet coolers. Specific permit requirements are listed below Table 5.2.

**Table 5.2 APPLICABLE REQUIREMENTS SUMMARY FOR PELLET COOLER NO.'S 1 AND 2**

<b>Permit Conditions</b>	<b>Affected Emissions Unit</b>	<b>Parameter</b>	<b>Permit Limit/ Standard Summary</b>	<b>Applicable Regulatory Requirement</b>	<b>Monitoring and Recordkeeping Requirements</b>
1.7	Each emission point	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	1.8, 5.2, 5.3
5.1	Pellet Cooler No. 1, Pellet Cooler No. 2, Pellet Cooler No. 3	PM	Process weight	IDAPA 58.01.01.702	5.2, 5.3

***Permit Limits/Operating Requirements***

5.1 No person shall emit to the atmosphere from any process or process equipment operating prior to October 1, 1979, PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour.

a. If PW is less than 17,000 lb/hr,

$$E = 0.045(PW)^{0.60}$$

b. If PW is equal to or greater than 17,000 lb/hr,

$$E = 1.12(PW)^{0.27}$$

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**[IDAPA 58.01.01.702, 4/5/00]**

- 5.2 The permittee shall at all times maintain in good working order and operate in accordance with the O&M manual, or as efficiently as practicable, all pellet coolers and cyclones. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Department which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

**[IDAPA 58.01.01.322.01 (state-only), 3/19/99]**

### ***Operations and Maintenance Manual***

- 5.3 The permittee shall develop an O&M manual and submit it to the Department within one year of permit issuance. The O&M manual is part of the terms and conditions of the permit.
- The permittee shall update the control device monitoring program in the O&M manual as necessary. Each updated control device monitoring program in the O&M manual shall be submitted to the Department with 30 days of the updating.
  - The O&M manual shall address the operation, maintenance, and repair of cyclones to ensure that they are in good working order and operate as efficiently as practicable. The manual shall, at a minimum, include a general description of the control device; normal operating conditions and procedures; startup, shutdown, and maintenance procedures; upset conditions and corrective procedures; methods of preventing malfunctions; appropriate corrective actions to be taken; provisions for monthly inspections during regular operations; and provisions for annual inspections during planned maintenance outages. The permittee shall keep records of maintenance activities in accordance with Permit Condition 1.11.
  - The O&M manual shall include a control device monitoring program that establishes control device operating parameters to be monitored, their acceptable operating ranges, corrective action levels, monitoring equipment and procedures, monitoring frequency, and frequency of recordkeeping. The control device monitoring program shall be developed by the permittee based on compliance test results, vendor data, and other supporting documentation.
  - The O&M manual shall be maintained onsite and made available to Department representatives upon request.
  - Whenever an operating parameter is outside the operating range specified by the control device monitoring program in the O&M manual, the permittee shall take corrective action as expeditiously as practicable to bring the operating parameter back within the operating range. Deviations from the operating range may not by themselves be considered deviations from applicable emissions standards unless the Department determines that the frequency, duration, or magnitude of the deviations indicates that additional action is required. Failure to take corrective action may be considered a violation of this Permit Condition, if appropriate. All deviations shall be reported in accordance with Permit Conditions 1.9 and 14.25.

**[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94]**

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**6. EMISSIONS UNITS GROUP 5 - LIME KILNS (P-K1/2A, P-K1/2B, P-K1/2C, P-K1/2D, P-K1/2E, P-K1/2F, P-K2B)**

The following is a narrative description of the lime kilns regulated in this Tier I operating permit. This description is for informational purposes only.

The gas kiln, manufactured by Union Carbide and rated at 200 tons, was installed prior to 1970. The coke kiln, manufactured by Larowe Construction and is a 100-ton Belgium model, was also installed prior to 1970.

Table 6.1 describes the control devices used in controlling emissions from the lime kilns.

**Table 6.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES**

<b>Emission Point/Source Identification</b>	<b>Emissions Unit(s) Identification</b>	<b>Emission Control Device</b>
P-K1/2A, P-K1/2B, and P-K1/2C; and/or P-K1/2D, P-K1/2E, and P-K1/2F	362 tons lime rock per day natural gas-fired lime kiln; 0.93 million cubic feet of natural gas per day Gas Kiln (S-K1)	Two gas washers (A - K1) in series and three carbonation tanks (A - K1/2) in parallel
P-K1/2A, P-K1/2B, and P-K1/2C;	168 tons lime rock per day coke-fired lime kiln, 12 tons coke per day Coke Kiln (S-K2)	Two gas washers (A - K2A) in series and three carbonation tanks (A - K1/2) in parallel
P-K2B		One bypass scrubber (A - K2B) while charging the kiln

Table 6.2 contains a summary of requirements that apply generally to the lime kilns. Specific permit requirements are listed below Table 6.2.

**Table 6.2 APPLICABLE REQUIREMENTS SUMMARY**

<b>Permit Conditions</b>	<b>Affected Emission Unit</b>	<b>Parameter</b>	<b>Permit Limit/Standard Summary</b>	<b>Applicable Regulatory Requirement</b>	<b>Monitoring and Recordkeeping Requirements</b>
1.7	Each emission point	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	1.8, 6.2, 6.3
6.1	Gas kiln	PM	Process weight	IDAPA 58.01.01.702	6.2, 6.3
	Coke kiln				

**Permit Limits/Operating Requirements**

6.1 No person shall emit to the atmosphere from any process or process equipment operating prior to October 1, 1979, PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour.

a. If PW is less than 17,000 lb/hr,

$$E = 0.045(PW)^{0.60}$$

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- b. If PW is equal to or greater than 17,000 lb/hr,

$$E = 1.12(PW)^{0.27}$$

[IDAPA 58.01.01.702, 4/5/00]

- 6.2 The permittee shall at all times maintain in good working order and operate in accordance with the O&M manual, or as efficiently as practicable, lime kilns, gas washers, and scrubbers. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Department which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

[IDAPA 58.01.01.322.01 (state-only), 3/19/99]

### ***Operations and Maintenance Manual***

- 6.3 The permittee shall develop an O&M manual and submit it to the Department within one year of permit issuance. The O&M manual is part of the terms and conditions of the permit.
- The permittee shall update the control device monitoring program in the O&M manual as necessary. Each updated control device monitoring program in the O&M manual shall be submitted to the Department with 30 days of the updating.
  - The O&M manual shall address the operation, maintenance, and repair of the lime kilns, gas washers, and scrubbers to ensure that they are in good working order and operate as efficiently as practicable. The manual shall, at a minimum, include a general description of the control devices; normal operating conditions and procedures; startup, shutdown, and maintenance procedures; upset conditions and corrective procedures; methods of preventing malfunctions; appropriate corrective actions to be taken; provisions for monthly inspections during regular operations; and provisions for annual inspections during planned maintenance outages. The permittee shall keep records of maintenance activities in accordance with Permit Condition 1.11.
  - The O&M manual shall include a control device monitoring program that establishes control device operating parameters to be monitored, their acceptable operating ranges, corrective action levels, monitoring equipment and procedures, monitoring frequency, and frequency of recordkeeping. The control device monitoring program shall be developed by the permittee based on compliance test results, vendor data, and other supporting documentation.
  - The O&M manual shall be maintained onsite and made available to Department representatives upon request.
  - Whenever an operating parameter is outside the operating range specified by the control device monitoring program in the O&M manual, the permittee shall take corrective action as expeditiously as practicable to bring the operating parameter back within the operating range. Deviations from the operating range may not by themselves be considered deviations from applicable emissions standards unless the Department determines that the frequency, duration, or magnitude of the deviations indicates that additional action is required. Failure to take corrective action may be considered a violation of this permit condition, if appropriate. All deviations shall be reported in accordance with Permit Conditions 1.9 and 14.25.

[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94]

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**7. EMISSIONS UNITS GROUP 6 - FLUME SLAKER AND PROCESS SLAKER (P-K3)**

The following is a narrative description of the flume slaker and process slaker regulated in this Tier I operating permit. This description is for informational purposes only.

The facility operates two lime slakers to produce milk of lime from crushed calcium oxide (CaO) rocks and water. Lime slakers are batch processes, per the application. Slaker emissions are controlled by a common spray-chamber type scrubber.

Table 7.1 describes the control devices used in controlling emissions from the slakers.

**Table 7.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES**

Emission Point/Source Identification	Emissions Unit(s) Identification	Emissions Unit(s) Identification	Emission Control Device
P-K3	Rated total 367 tons CaO per day	Flume slaker (S-K3)	One spray chamber scrubber
		Process slaker (S-K3)	

Table 7.2 contains a summary of requirements that apply generally to the slakers. Specific permit requirements are listed below Table 7.2.

**Table 7.2 APPLICABLE REQUIREMENTS SUMMARY**

Permit Conditions	Affected Emission Unit	Parameter	Permit Limit/Standard Summary	Applicable Regulatory Requirement	Monitoring and Recordkeeping Requirements
1.7	Flume slaker and process slaker	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	1.8, 7.2, 7.3
7.1	Flume slaker and process slaker	PM	Process weight rate	IDAPA 58.01.01.701	7.2, 7.3

***Permit Limits/Operating Requirements***

7.1 No person shall emit to the atmosphere from any process or process equipment commencing operation on or after October 1, 1979, PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour.

- a. If PW is less than 9,250 lb/hr,

$$E = 0.045(PW)^{0.60}$$

- b. If PW is equal to or greater than 9,250 lb/hr,

$$E = 1.12(PW)^{0.27}$$

**[IDAPA 58.01.01.702, 4/5/00]**

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 067-00001

**Permittee:** The Amalgamated Sugar Company, LLC      **Date Issued:** December 12, 2002  
**Location:** Paul, Idaho      **Date Expires:** December 12, 2005

*The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.*

- 7.2 The permittee shall at all times maintain in good working order and operate in accordance with the O&M manual, or as efficiently as practicable, the flume slaker, process slaker, and scrubber. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Department which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

[IDAPA 58.01.01.322.01 (state-only), 3/19/99]

### ***Operations and Maintenance Manual***

- 7.3 The permittee shall develop an O&M manual and submit it to the Department within one year of permit issuance. The O&M manual is part of the terms and conditions of the permit.
- The permittee shall update the control device monitoring program in the O&M manual as necessary. Each updated control device monitoring program in the O&M manual shall be submitted to the Department with 30 days of the updating.
  - The O&M manual shall address the operation, maintenance, and repair of the flume slaker, process slaker, and the scrubber to ensure that they are in good working order and operate as efficiently as practicable. The manual shall, at a minimum, include a general description of the control devices; normal operating conditions and procedures; startup, shutdown, and maintenance procedures; upset conditions and corrective procedures; methods of preventing malfunctions; appropriate corrective actions to be taken; provisions for monthly inspections during regular operations; and provisions for annual inspections during planned maintenance outages. The permittee shall keep records of maintenance activities in accordance with Permit Condition 1.11.
  - The O&M manual shall include a control device monitoring program that establishes control device operating parameters to be monitored, their acceptable operating ranges, corrective action levels, monitoring equipment and procedures, monitoring frequency, and frequency of recordkeeping. The control device-monitoring program shall be developed by the permittee based on compliance test results, vendor data, and other supporting documentation.
  - The O&M manual shall be maintained onsite and made available to Department representatives upon request.
  - Whenever an operating parameter is outside the operating range specified by the control device monitoring program in the O&M manual, the permittee shall take corrective action as expeditiously as practicable to bring the operating parameter back within the operating range. Deviations from the operating range may not by themselves be considered deviations from applicable emissions standards unless the Department determines that the frequency, duration, or magnitude of the deviations indicates that additional action is required. Failure to take corrective action may be considered a violation of this permit condition, if appropriate. All deviations shall be reported in accordance with the Permit Conditions 1.9 and 14.25.

[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94]

**AIR QUALITY TIER I OPERATING PERMIT NUMBER: 067-00001**

**Permittee:** The Amalgamated Sugar Company, LLC      **Date Issued:** December 12, 2002  
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**8. EMISSION UNITS GROUP 7 - DRYING GRANULATOR (P-W1)**

The following is a narrative description of the drying granulator, identified as emission point P-W1, regulated in this Tier I operating permit. This description is for informational purposes only.

The facility operates a drying granulator to dry wet sugar. The drying granulator was manufactured by TASC0 and installed prior to 1952. Emissions from the drying granulator are controlled by a dust box type scrubber.

Table 8.1 describes the devices used to control emissions from the drying granulator.

**Table 8.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES**

Emission Point/Source Identification	Emissions Unit(s) Identification	Emission Control Device
P-W1	65 tons sugar per hour drying granulator (S-W1)	Scrubber (A -W1)

Table 8.2 contains a summary of requirements that apply generally to the drying granulator. Specific permit requirements are listed below Table 8.2.

**Table 8.2 APPLICABLE REQUIREMENTS SUMMARY**

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Regulatory Requirement	Monitoring and Recordkeeping Requirements
1.7	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	1.8, 8.2, 8.3
8.1	PM	Process weight	IDAPA 58.01.01.702	8.2, 8.3

**Permit Limits/Operating Requirements**

8.1 No person shall emit to the atmosphere from any process or process equipment operating prior to October 1, 1979, PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour:

a. If PW is less than 17,000 lb/hr,

$$E = 0.045(PW)^{0.60}$$

b. If PW is equal to or greater than 17,000 lb/hr,

$$E = 1.12(PW)^{0.27}$$

**[IDAPA 58.01.01.702, 4/5/00]**

8.2 The permittee shall at all times maintain in good working order and operate in accordance with the O&M manual, or as efficiently as practicable, the drying granulator and its scrubber. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Department which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

**[IDAPA 58.01.01.322.01 (state-only), 3/19/99]**

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 067-00001

**Permittee:** The Amalgamated Sugar Company, LLC      **Date Issued:** December 12, 2002  
**Location:** Paul, Idaho      **Date Expires:** December 12, 2005

*The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.*

***Operations and Maintenance Manual***

- 8.3 The permittee shall develop an initial O&M manual and submit it to the Department within one year of permit issuance. The O&M Manual is part of the terms and conditions of the permit.
- The permittee shall update the control device monitoring program in the O&M manual as necessary. Each updated control device monitoring program in the O&M manual shall be submitted to the Department with 30 days of the updating.
  - The O&M manual shall address the operation, maintenance, and repair of the drying granulator and its scrubber to ensure that they are in good working order and operate as efficiently as practicable. The manual shall, at a minimum, include a general description of the control devices; normal operating conditions and procedures; startup, shutdown, and maintenance procedures; upset conditions and corrective procedures; methods of preventing malfunctions; appropriate corrective actions to be taken; provisions for monthly inspections during regular operations; and provisions for annual inspections during planned maintenance outages. The permittee shall keep records of maintenance activities in accordance with Permit Condition 1.11.
  - The O&M manual shall include a control device monitoring program that establishes control device operating parameters to be monitored, their acceptable operating ranges, corrective action levels, monitoring equipment and procedures, monitoring frequency, and frequency of recordkeeping. The control device-monitoring program shall be developed by the permittee based on compliance test results, vendor data, and other supporting documentation.
  - The O&M manual shall be maintained onsite and made available to Department representatives upon request.
  - Whenever an operating parameter is outside the operating range specified by the control device monitoring program in the O&M manual, the permittee shall take corrective action as expeditiously as practicable to bring the operating parameter back within the operating range. Deviations from the operating range may not by themselves be considered deviations from applicable emissions standards unless the Department determines that the frequency, duration, or magnitude of the deviations indicates that additional action is required. Failure to take corrective action may be considered a violation of this permit condition, if appropriate. All deviations shall be reported in accordance with the Permit Conditions 1.9 and 14.25.

[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94]

**AIR QUALITY TIER I OPERATING PERMIT NUMBER: 067-00001**

**Permittee:** The Amalgamated Sugar Company, LLC      **Date Issued:** December 12, 2002  
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**9. EMISSIONS UNITS GROUP 8 - COOLING GRANULATORS (P-W2, P-W3)**

The following is a narrative description of the cooling granulators regulated in this Tier I operating permit. This description is for informational purposes only.

The facility operates two cooling granulators to cool hot sugar from the drying granulator. Each cooling granulator is rated at 65T/hr. Emissions from the cooling granulators are controlled by baghouses.

Table 9.1 describes the devices used to control emissions from the cooling granulators.

**Table 9.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES**

<b>Emission Point/Source Identification</b>	<b>Emissions Unit(s) Identification</b>	<b>Emission Control Device</b>
P-W2	Cooling granulator No. 1 (S-W2)	Baghouses (A – W2)
P-W3	Cooling granulator No. 2 (S-W3)	Baghouses (A – W3)

The following table contains a summary of requirements that apply generally to the cooling granulators. Specific permit requirements are listed below Table 9.2.

**Table 9.2 APPLICABLE REQUIREMENTS SUMMARY**

<b>Permit Conditions</b>	<b>Affected Emissions Unit</b>	<b>Parameter</b>	<b>Permit Limit/Standard Summary</b>	<b>Applicable Regulatory Requirement</b>	<b>Monitoring and Recordkeeping Requirements</b>
1.7	Cooling granulator No. 1 and cooling granulator No. 2	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	1.8, 9.3, 9.4
9.1, 9.2	Cooling granulator No. 1; Cooling granulator No. 2	PM	Process weight	IDAPA 58.01.01.701; IDAPA 58.01.01.702	9.3, 9.4

**Permit Limits/Operating Requirements**

9.1 No person shall emit to the atmosphere from any process or process equipment operating prior to October 1, 1979, PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour.

a. If PW is less than 17,000 lb/hr,

$$E = 0.045(PW)^{0.60}$$

b. If PW is equal to or greater than 17,000 lb/hr,

$$E = 1.12(PW)^{0.27}$$

[IDAPA 58.01.01.702, 4/5/00]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 067-00001

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**Location:** Paul, Idaho      **Date Expires:** December 12, 2005

*The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.*

9.2 No person shall emit to the atmosphere from any process or process equipment commencing operation on or after October 1, 1979, PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour.

a. If PW is less than 9,250 lb/hr,

$$E = 0.045(PW)^{0.60}$$

b. If PW is equal to or greater than 9,250 lb/hr,

$$E = 1.10(PW)^{0.25}$$

[IDAPA 58.01.01.701 4/5/00]

9.3 The permittee shall at all times maintain in good working order and operate in accordance with the O&M manual, or as efficiently as practicable, the two cooling granulators and their associated baghouses. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Department which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

[IDAPA 58.01.01.322.01 (state-only), 3/19/99]

### ***Operations and Maintenance Manual***

9.4 The permittee shall develop an initial O&M manual and submit it to the Department within one year of permit issuance. The O&M Manual is part of the terms and conditions of the permit.

- The permittee shall update the control device monitoring program in the O&M manual as necessary. Each updated control device monitoring program in the O&M manual shall be submitted to the Department with 30 days of the updating.
- The O&M manual shall address the operation, maintenance, and repair of the two cooling granulators and the associated baghouses to ensure that they are in good working order and operate as efficiently as practicable. The manual shall, at a minimum, include a general description of the control devices; normal operating conditions and procedures; startup, shutdown, and maintenance procedures; upset conditions and corrective procedures; methods of preventing malfunctions; appropriate corrective actions to be taken; provisions for monthly inspections during regular operations; and provisions for annual inspections during planned maintenance outages. The permittee shall keep records of maintenance activities in accordance with Permit Condition 1.11.
- The O&M manual shall include a control device monitoring program that establishes control device operating parameters to be monitored, their acceptable operating ranges, corrective action levels, monitoring equipment and procedures, monitoring frequency, and frequency of recordkeeping. The control device-monitoring program shall be developed by the permittee based on performance test results, vendor data, and other supporting documentation.
- The O&M manual shall be maintained onsite and made available to Department representatives upon request.

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 067-00001

**Permittee:** The Amalgamated Sugar Company, LLC      **Date Issued:** December 12, 2002  
**Location:** Paul, Idaho      **Date Expires:** December 12, 2005

*The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.*

- Whenever an operating parameter is outside the operating range specified by the control device monitoring program in the O&M manual, the permittee shall take corrective action as expeditiously as practicable to bring the operating parameter back within the operating range. Deviations from the operating range may not by themselves be considered deviations from applicable emissions standards unless the Department determines that the frequency, duration, or magnitude of the deviations indicates that additional action is required. Failure to take corrective action may be considered a violation of this permit condition, if appropriate. All deviations shall be reported in accordance with the Permit Conditions 1.9 and 14.25.

[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94]

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*The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.*

**10. EMISSIONS UNIT GROUP 9 - SUGAR HANDLING SYSTEM (P-W4, P-W5)**

The following is a narrative description of the sugar handling system regulated in this Tier I operating permit. This description is for informational purposes only.

Particulate matter is emitted from process sugar handling and sugar handling bulk loading systems. Emissions are controlled by baghouses.

Table 10.1 describes the devices used to control emissions from the sugar handling system.

**Table 10.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES**

Emission Point/Source Identification	Emissions Unit(s) Identification	Emission Control Device
P-W4	Process sugar-handling system with ventilation of 16,600 acfm to baghouses (Process S-W4)	Baghouses (A –W4)
P-W5	Bulk loadout sugar-handling system with ventilation of 17,000 acfm to baghouses (Bulk Loadout S-W5)	Baghouses (A –W5)

Table 10.2 contains a summary of requirements that apply generally to sugar handling. Specific permit requirements are listed below Table 10.2.

**Table 10.2 APPLICABLE REQUIREMENTS SUMMARY**

Permit Conditions	Affected Emission Unit/Source	Parameter	Permit Limit/ Standard Summary	Applicable Regulatory Requirement	Monitoring and Recordkeeping Requirements
1.7	Baghouse vents	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	1.8, 10.2, 10.3
10.1	Sugar-handling (Process)	PM	Process weight	IDAPA 58.01.01.702	10.2, 10.3
10.1	Sugar-handling (Bulk Loadout)	PM	Process weight	IDAPA 58.01.01.702	10.2, 10.3

**Permit Limits/Operating Requirements**

10.1 No person shall emit to the atmosphere from any process or process equipment operating prior to October 1, 1979, PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour.

a. If PW is less than 17,000 lb/hr,

$$E = 0.045(PW)^{0.60}$$

b. If PW is equal to or greater than 17,000 lb/hr,

$$E = 1.12(PW)^{0.27}$$

**[IDAPA 58.01.01.702, 4/5/00]**

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 067-00001

**Permittee:** The Amalgamated Sugar Company, LLC      **Date Issued:** December 12, 2002  
**Location:** Paul, Idaho      **Date Expires:** December 12, 2005

*The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.*

- 10.2 The permittee shall at all times maintain the sugar-handling baghouses in good working order and operate in accordance with the O&M manual, or as efficiently as practicable. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Department which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

[IDAPA 58.01.01.322.01 (state-only), 3/19/99]

***Operations and Maintenance Manual***

- 10.3 The permittee shall develop an initial O&M manual and submit it to the Department within one year of permit issuance. The O&M Manual is part of the terms and conditions of the permit.

- The permittee shall update the control device monitoring program in the O&M manual as necessary. Each updated control device monitoring program in the O&M manual shall be submitted to the Department with 30 days of the updating.
- The O&M manual shall address the operation, maintenance, and repair of the sugar-handling baghouses to ensure that they are in good working order and operate as efficiently as practicable. The manual shall, at a minimum, include a general description of the control devices; normal operating conditions and procedures; startup, shutdown, and maintenance procedures; upset conditions and corrective procedures; methods of preventing malfunctions; appropriate corrective actions to be taken; provisions for monthly inspections during regular operations; and provisions for annual inspections during planned maintenance outages. The permittee shall keep records of maintenance activities in accordance with Permit Condition 1.11.
- The O&M manual shall include a control device monitoring program that establishes control device operating parameters to be monitored, their acceptable operating ranges, corrective action levels, monitoring equipment and procedures, monitoring frequency, and frequency of recordkeeping. The control device-monitoring program shall be developed by the permittee based on compliance test results, vendor data, and other supporting documentation.
- The O&M manual shall be maintained onsite and made available to Department representatives upon request.
- Whenever an operating parameter is outside the operating range specified by the control device monitoring program in the O&M manual, the permittee shall take corrective action as expeditiously as practicable to bring the operating parameter back within the operating range. Deviations from the operating range may not by themselves be considered deviations from applicable emissions standards unless the Department determines that the frequency, duration, or magnitude of the deviations indicates that additional action is required. Failure to take corrective action may be considered a violation of this permit condition, if appropriate. All deviations shall be reported in accordance with the Permit Conditions 1.9 and 14.25.

[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94]

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**11. EMISSIONS UNITS GROUP 10 - LIME KILN BUILDING MATERIAL HANDLING BAGHOUSES**

The following is a narrative description of the lime kiln building material handling baghouses regulated in this Tier I operating permit. This description is for informational purposes only.

Particulate matter emissions from the lime kiln building material handling are controlled by four baghouses.

Table 11.1 describes the devices used to control emissions from the lime kiln building.

**Table 11.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES**

Emission Point/ Source Identification	Emissions Unit(s) Identification	Emission Control Device
None identified	Lime kiln building material handling	Four baghouses

Table 11.2 contains a summary of requirements that apply generally to the four lime kiln building material handling baghouses. Specific permit requirements are listed below Table 11.2.

**Table 11.2 APPLICABLE REQUIREMENTS SUMMARY**

Permit Conditions	Affected Emission Unit	Parameter	Permit Limit/ Standard Summary	Applicable Regulatory Requirement	Monitoring and Recordkeeping Requirements
1.7	Each baghouse	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	1.8, 11.2, 11.3
11.1	All four baghouses	PM	Process weight	IDAPA 58.01.01.702	11.2, 11.3

***Permit Limits/Operating Requirements***

11.1 No person shall emit to the atmosphere from any process or process equipment operating prior to October 1, 1979, PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour.

- a. If PW is less than 17,000 lb/hr,

$$E = 0.045(PW)^{0.60}$$

- b. If PW is equal to or greater than 17,000 lb/hr,

$$E = 1.12(PW)^{0.27}$$

**[IDAPA 58.01.01.702, 4/5/00]**

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 067-00001

**Permittee:** The Amalgamated Sugar Company, LLC      **Date Issued:** December 12, 2002  
**Location:** Paul, Idaho      **Date Expires:** December 12, 2005

*The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.*

- 11.2 The permittee shall at all times maintain the baghouses in good working order and operate in accordance with the O&M manual, or as efficiently as practicable. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Department which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

[IDAPA 58.01.01.322.01 (state-only), 3/19/99]

***Operations and Maintenance Manual***

- 11.3 The permittee shall develop an initial O&M manual and submit it to the Department within one year of permit issuance. The O&M Manual is part of the terms and conditions of the permit.

- The permittee shall update the control device monitoring program in the O&M manual as necessary. Each updated control device monitoring program in the O&M manual shall be submitted to the Department with 30 days of the updating.
- The O&M manual shall address the operation, maintenance, and repair of the baghouses to ensure that they are in good working order and operate as efficiently as practicable. The manual shall, at a minimum, include a general description of the control devices; normal operating conditions and procedures; startup, shutdown, and maintenance procedures; upset conditions and corrective procedures; methods of preventing malfunctions; appropriate corrective actions to be taken; provisions for monthly inspections during regular operations; and provisions for annual inspections during planned maintenance outages. The permittee shall keep records of maintenance activities in accordance with Permit Condition 1.11.
- The O&M manual shall include a control device monitoring program that establishes control device operating parameters to be monitored, their acceptable operating ranges, corrective action levels, monitoring equipment and procedures, monitoring frequency, and frequency of recordkeeping. The control device-monitoring program shall be developed by the permittee based on compliance test results, vendor data, and other supporting documentation.
- The O&M manual shall be maintained onsite and made available to Department representatives upon request.
- Whenever an operating parameter is outside the operating range specified by the control device monitoring program in the O&M manual, the permittee shall take corrective action as expeditiously as practicable to bring the operating parameter back within the operating range. Deviations from the operating range may not by themselves be considered deviations from applicable emissions standards unless the Department determines that the frequency, duration, or magnitude of the deviations indicates that additional action is required. Failure to take corrective action may be considered a violation of this permit condition, if appropriate. All deviations shall be reported in accordance with the Permit Conditions 1.9, and 14.25.

[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94]

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 067-00001

**Permittee:** The Amalgamated Sugar Company, LLC      **Date Issued:** December 12, 2002  
**Location:** Paul, Idaho      **Date Expires:** December 12, 2005

*The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.*

**12. NON-APPLICABILITY DETERMINATION**

- 12.1 The standards for fuel-burning equipment particulate matter, IDAPA 58.01.01.675 do not apply to pulp dryers, which are included under Section 4 of this permit, or lime kilns which are included under Section 6 of this permit.
- 12.2 The grain-loading standard (0.1 gr/dscf) in Section 1.1 of the existing Permit No. 1020-0001 dated January 1, 1984, does not apply to pulp dryers under Section 4 of this permit.
- 12.3 Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971, 40 CFR 60, Subpart D, does not currently apply to the B & W boiler.
- 12.4 Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971, 40 CFR 60, Subpart D, does not currently apply to the Erie City boiler.
- 12.5 Permit Conditions 2.1, 2.2, 3.1, 3.2, 3.3, 3.4, 4.1, 4.2, 4.3, and 4.4 of existing Permit No. 1020-0001, dated January 1, 1984, are no longer applicable because they pertain to the 1984 through 1986 campaign seasons which have been completed.

**[IDAPA 58.01.01.325, 5/1/94]**

**AIR QUALITY TIER I OPERATING PERMIT NUMBER: 067-00001**

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**Location:** Paul, Idaho      **Date Expires:** December 12, 2005

*The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.*

**13. COMPLIANCE SCHEDULE**

TASCO shall implement the following compliance schedule to assure compliance with the applicable requirements in the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.01, et seq. The permittee shall obtain a combined facility-wide Tier II operating permit and PTC (hereafter referred to as the facility-wide permit) and a modified Tier I operating permit. The specific elements of the compliance schedule are summarized in Table 13.1 and specified in Permit Conditions 13.2 through 13.9.

**Table 13.1 COMPLIANCE SCHEDULE**

<b>Permit Conditions</b>	<b>Milestone</b>	<b>Deadline</b>	<b>Documentation / Reporting</b>
13.2	Submit complete facility-wide permit application to comply with IDAPA 58.01.01.400 through 410	180 days after issuance of the Tier I operating permit	Completeness letter from the Department
13.3	Concurrently submit complete application information to address the applicable PTC requirements in IDAPA 58.01.01.200 through 223 for those sources for which the permittee was required to, but did not obtain, a PTC	180 days after issuance of the Tier I operating permit	Completeness letter from the Department
13.4	Submit supplemental application information to address the applicable PTC requirements for any additional sources identified	Within 30 days of a request in writing by the Department during processing of the facility-wide permit	Completeness letter from the Department
13.7	Submit a request to modify the Tier I operating permit	30 days after the facility-wide permit application is found complete	Completeness letter from the Department
13.8	Submit quarterly progress reports	January 1, April 1, July 1, and October 1 of each year	

13.1 The Department identified the following sources as sources that are not in compliance because of failure to obtain a permit to construct prior to construction or modification:

- The third, fourth, and fifth evaporators replaced prior to the 2001 beet campaign
- The sixth evaporator constructed in 2002

The permittee has the continuing responsibility to submit any supplementary information needed, including information for any other sources, in accordance with IDAPA 58.01.01.315.

13.2 TASCO shall submit a complete permit application and all additional information requested by the Department for issuance of a facility-wide Tier II operating permit within 180 days of issuance of this Tier I operating permit. The application shall address the requirements for Tier II operating permits in accordance with IDAPA 58.01.01.400 through 410.

**[IDAPA 58.01.01.322.10, 4/5/00]**

AIR QUALITY TIER I OPERATING PERMIT NUMBER: 067-00001

**Permittee:** The Amalgamated Sugar Company, LLC      **Date Issued:** December 12, 2002  
**Location:** Paul, Idaho      **Date Expires:** December 12, 2005

*The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.*

- 13.3 In addition to the requirements for Tier II operating permits, the facility-wide permit application shall include all of the applicable information and address the applicable requirements for PTCs in accordance with IDAPA 58.01.01.200 through IDAPA 58.01.01.223 for the construction and/or modification of sources for which the permittee was required to, but did not obtain, a PTC. The Department has identified the sources listed in Permit Condition 13.1 as sources that failed to obtain a permit prior to construction or modification.  
**[IDAPA 58.01.01.322.10, 4/5/00]**
- 13.4 If through the development of the facility-wide permit, it is determined that the facility should have obtained a PTC or a PTC modification for any other source or sources at the facility, the permittee shall submit a supplemental application that addresses the applicable requirements for PTCs within 30 days of receiving written notification from the Department.  
**[IDAPA 58.01.01.322.10, 4/5/00]**
- 13.5 The application submittal deadlines set forth in the compliance schedule may be extended if the permittee clearly demonstrates that additional time is needed to collect new data for submittal of a complete application. Extension requests, with complete information to justify the request, must be submitted in writing to the Department no later than the midpoint of the milestone timeline. The deadlines may be extended for up to one year through written authorization from the Department.  
**[IDAPA 58.01.01.322.10, 4/5/00]**
- 13.6 Upon receipt of a complete application, the Department will draft a single proposed facility-wide permit for the facility. The permit will contain all of the terms and conditions necessary to comply with the applicable requirements for PTCs in accordance with IDAPA 58.01.01.200 through 223 and the requirements for Tier II operating permits in accordance with IDAPA 58.01.01.400 through 410. The permit will clearly identify the origin and basis for each term and condition. The procedures for issuing a PTC under IDAPA 58.01.01.209 shall be followed concurrently with the procedures for issuing a Tier II operating permit under IDAPA 58.01.01.404.  
**[IDAPA 58.01.01.322.10, 4/5/00]**
- 13.7 TASCOS shall request a modification to their Tier I operating permit within 30 days after the combined facility-wide Tier II operating permit and PTC application is determined complete by the Department. The Tier I operating permit shall be modified to incorporate all applicable requirements of the facility-wide permit and shall be issued concurrently with the facility-wide permit in accordance with the procedures for issuing a Tier I permit in IDAPA 58.01.01.360 through 369.  
**[IDAPA 58.01.01.322.10, 4/5/00]**
- 13.8 Until such time that a modified Tier I operating permit is issued pursuant to Permit Condition 13.7, TASCOS shall submit a progress report each calendar quarter to the Department stating when each of the milestones and compliance with each condition in the compliance schedule were or will be achieved, and an explanation of why any dates were not or will not be met and a detailed description of any preventative or corrective measures undertaken by the permittee.  
**[IDAPA 58.01.01.322.10, 4/5/00]**
- 13.9 This schedule of compliance shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it is based.  
**[IDAPA 58.01.01.322.10, 4/5/00]**

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## 14. TIER I OPERATING PERMIT GENERAL PROVISIONS

### **General Compliance**

- 14.1 The permittee shall comply with all conditions of this permit. Any permit noncompliance constitutes a violation and is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application.  
[IDAPA 58.01.01.322.15.a, 5/1/94; 40 CFR 70.6(a)(6)(i)]
- 14.2 It shall not be a defense in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the terms and conditions of this permit.  
[IDAPA 58.01.01.322.15.b, 5/1/94; 40 CFR 70.6(a)(6)(ii)]
- 14.3 Any permittee who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information.  
[IDAPA 58.01.01.315.01, 5/1/94; 40 CFR 70.5(b)]

### **Reopening**

- 14.4 This permit may be revised, reopened, revoked and reissued, or terminated for cause. Cause for reopening exists under any of the circumstances listed in IDAPA 58.01.01.386. Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable in accordance with IDAPA 58.01.01.360 through 369.  
[IDAPA 58.01.01.322.15.c 5/1/94; IDAPA 58.01.01.386, 3/19/99;  
40 CFR 70.7(f)(1)(2); 40 CFR 70.6(a)(6)(iii)]
- 14.5 The filing of a request by the permittee for a permit revision, revocation and reissuance, termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.  
[IDAPA 58.01.01.322.15.d, 5/1/94; 40 CFR 70.6(a)(6)(iii)]

### **Property Rights**

- 14.6 This permit does not convey any property rights of any sort, or any exclusive privilege.  
[IDAPA 58.01.01.322.15.e, 5/1/94; 40 CFR 70.6(a)(6)(iv)]

### **Information Requests**

- 14.7 The permittee shall furnish all information requested by the Department, within a reasonable time, that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit.  
[Idaho Code §39-108; IDAPA 58.01.01.122, 5/1/94; IDAPA 58.01.01.322.15.f, 4/5/00;  
40 CFR 70.6(a)(6)(v)]

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- 14.8 Upon request, the permittee shall furnish to the Department copies of records required to be kept by this permit. For information claimed to be confidential, the permittee may furnish such records along with a claim of confidentiality in accordance with Idaho Code §9-342A and applicable implementing regulations including IDAPA 58.01.01.128.

[IDAPA 58.01.01.322.15.g, 5/1/94; IDAPA 58.01.01.128, 4/5/00; 40 CFR 70.6(a)(6)(v)]

### **Severability**

- 14.9 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.

[IDAPA 58.01.01.322.15.h, 5/1/94; 40 CFR 70.6(a)(5)]

### **Changes Requiring Permit Revision or Notice**

- 14.10 The permittee may not commence construction or modification of any stationary source, facility, major facility, or major modification without first obtaining all necessary permits to construct or an approval under IDAPA 58.01.01.213, or complying with IDAPA 58.01.01.220 through 223. The permittee shall comply with IDAPA 58.01.01.380 through 386 as applicable.

[IDAPA 58.01.01.200-223, 4/5/00; IDAPA 58.01.01.322.15.i, 380-386, 4/5/00;  
40 CFR 70.4(b)(12)(14)(15); 40 CFR 70.7(d)(e);]

- 14.11 Changes not addressed or prohibited by the Tier I operating permit require a Tier I operating permit revision if such changes are subject to any requirement under Title IV of the CAA, 42 U.S.C. Section 7651 through 7651c, or are modifications under Title I of the CAA, 42 USC Section 7401 through 7515. Administrative amendments (IDAPA 58.01.01.381), minor permit modifications (IDAPA 58.01.01.383), and significant permit modifications (IDAPA 58.01.01.382) require a revision to the Tier I operating permit. Section 502(b)(10) changes are authorized in accordance with IDAPA 58.01.01.384. Off-permit changes and required notice are authorized in accordance with IDAPA 58.01.01.385.

[IDAPA 58.01.01.381-385, 3/19/99; IDAPA 58.01.01.209.05, 5/1/94;  
40 CFR 70.4(b)(14)(15)]

### **Federal and State Enforceability**

- 14.12 Unless specifically identified as a "state-only" provision, all terms and conditions in this permit, including any terms and conditions designed to limit a source's potential to emit, are enforceable: (i) by the Department in accordance with state law; and (ii) by the United States or any other person in accordance with federal law.

[IDAPA 58.01.01.322.15.j, 5/1/94; 40 CFR 70.6(b)(1)(2)]

- 14.13 Provisions specifically identified as a "state-only" provision are enforceable only in accordance with state law. "State-only" provisions are those that are not required under the Federal Clean Air Act or under any of its applicable requirements, or those provisions adopted by the state prior to federal approval.

[Idaho Code §39-108; IDAPA 58.01.01.322.15.k, 3/23/98]

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### ***Inspection and Entry***

14.14 Upon presentation of credentials, the permittee shall allow the Department, or an authorized representative of the Department, to do the following:

Enter upon the permittee's premises where a Tier I source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;

Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;

Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and

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; IDAPA 58.01.01.322.15.i, 3/19/99; 40 CFR 70.6(c)(2)]**

### ***New Requirements During Permit Term***

14.15 The permittee shall comply with applicable requirements that become effective during the permit term on a timely basis.

**[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.10.a.ii, 5/1/94;  
40 CFR 70.6(c)(3) citing 70.5(c)(8)]**

### ***Fees***

14.16 The owner or operator of a Tier I source shall pay annual registration fees to the Department in accordance with IDAPA 58.01.01.525 through IDAPA 58.01.01.538.

**[IDAPA 58.01.01.322.15.n, 5/1/94; 40 CFR 70.6(a)(7)]**

### ***Certification***

14.17 All documents submitted to the Department shall be certified in accordance with IDAPA 58.01.01.123 and comply with IDAPA 58.01.01.124.

**[IDAPA 58.01.01.322.15.o, 5/1/94; 40 CFR 70.6(a)(3)(iii)(A); 40 CFR 70.5(d)]**

### ***Renewal***

14.18 a. The owner or operator of a Tier I source shall submit an application to the Department for a renewal of this permit at least six months before, but no earlier than 18 months before, the expiration date of this operating permit. To ensure that the term of the operating permit does not expire before the permit is renewed, the owner or operator is encouraged to submit a renewal application nine months prior to the date of expiration.

**[IDAPA 58.01.01.313.03, 4/5/00; 40 CFR 70.5(a)(1)(iii)]**

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- b. If a timely and complete application for a Tier I operating permit renewal is submitted, but the Department fails to issue or deny the renewal permit before the end of the term of this permit, then all the terms and conditions of this permit including any permit shield that may have been granted pursuant to IDAPA 58.01.01.325 shall remain in effect until the renewal permit has been issued or denied.

**[IDAPA 58.01.01.322.15.p, 5/1/94; 40 CFR 70.7(b)]**

### **Permit Shield**

14.19 Compliance with the terms and conditions of the Tier I operating permit, including those applicable to all alternative operating scenarios and trading scenarios, shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:

- a. Such applicable requirements are included and are specifically identified in the Tier I operating permit; or
  - i. The Department has determined that other requirements specifically identified are not applicable and all of the criteria set forth in IDAPA 58.01.01.325.01(b) have been met.
- b. The permit shield shall apply to permit revisions made in accordance with IDAPA 58.01.01.381.04 (administrative amendments incorporating the terms of a permit to construct), IDAPA 58.01.01.382.04 (significant modifications), and IDAPA 58.01.01.384.03 (trading under an emissions cap).
- c. Nothing in this permit shall alter or affect the following:
  - i. Any administrative authority or judicial remedy available to prevent or terminate emergencies or imminent and substantial dangers;
  - ii. The liability of an owner or operator of a source for any violation of applicable requirements prior to, or at the time, of permit issuance;
  - iii. The applicable requirements of the acid rain program, consistent with 42 USC Section 7651(g)(a); and
  - iv. The ability of EPA to obtain information from a source pursuant to Section 114 of the CAA; or the ability of the Department to obtain information from a source pursuant to Idaho Code §39-108 and IDAPA 58.01.01.122.

**[Idaho Code §39-108 and 112; IDAPA 58.01.01.122, 322.15.m, 325, 3/19/99;  
IDAPA 58.01.01.381.04, 382.04, 383.05, 384.03, 385.03, 3/19/99; 40 CFR 70.6(f)]**

### **Compliance Schedule and Progress Reports**

- 14.20 a. For each applicable requirement for which the source is not in compliance, the permittee shall comply with the compliance schedule incorporated in this permit.
- b. For each applicable requirement that will become effective during the term of this permit and that provides a detailed compliance schedule, the permittee shall comply with such requirements in accordance with the detailed schedule.

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- c. For each applicable requirement that will become effective during the term of this permit that does not contain a more detailed schedule, the permittee shall meet such requirements on a timely basis.
- d. For each applicable requirement with which the permittee is in compliance, the permittee shall continue to comply with such requirements.

[IDAPA 58.01.01.322.10, 4/5/00; IDAPA 58.01.01.314.9, 10, 5/1/94;  
40 CFR 70.6(c)(3)(4)]

***Periodic Compliance Certification***

- 14.21 a. The permittee shall submit compliance certifications during the term of the permit for each emissions unit to the Department and the EPA as follows:
- b. Compliance certifications for all emissions units shall be submitted annually beginning 12 months from the permit issuance date, or more frequently if specified by the underlying applicable requirement or elsewhere in this permit by the Department;
  - c. The compliance certification for each emissions unit shall address all of the terms and conditions contained in the Tier I operating permit that are applicable to such emissions unit including emissions limitations, standards, and work practices;
  - d. The compliance certification shall be in an itemized form providing the following information (provided that the identification of applicable information may cross-reference the permit or previous reports as applicable):
    - i. The identification of each term or condition of the Tier I operating permit that is the basis of the certification;
    - ii. The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the methods and means required by this Tier I operating permit. If necessary, the owner or operator shall identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the CAA which prohibits knowingly making a false certification or omitting material information;
    - iii. The status of compliance with the terms and conditions of the permit for the period covered by the certification, based on the method or means designated in Paragraph 14.21.d.ii above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred;
    - iv. Such other facts as the Department may require to determine the compliance status of the source.
    - v. All original compliance certifications shall be submitted to the Department and a copy of all compliance certifications shall be submitted to the EPA.

[IDAPA 58.01.01.322.11, 5/1/94; 40 CFR 70.6(c)(5)(iii) as amended,  
62 Fed. Reg. 54900, 54946, 10/22/97; 40 CFR 70.6(c)(5)(iv)]

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***False Statements***

- 14.22 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]

***No Tampering***

- 14.23 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]

***Semiannual Monitoring Reports***

- 14.24 In addition to all applicable reporting requirements identified in this permit, the permittee shall submit reports of any required monitoring at least every six months starting six months from the date of permit issuance. All instances of deviations from this operating permit's requirements must be clearly identified in the report. All required reports must be certified in accordance with IDAPA 58.01.01.123.  
[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.322.08.c, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

***Reporting Deviations and Excess Emissions***

- 14.25 The permittee shall promptly report all deviations from permit requirements including upset conditions, their probable cause, and any corrective actions or preventive measures taken. For excess emissions, the report shall be made in accordance with IDAPA 58.01.01.130-136. For all other deviations, the report shall be made in accordance with IDAPA 58.01.01.322.08.c, unless otherwise specified in this permit.  
[IDAPA 58.01.01.322.15.q, 3/23/98; IDAPA 58.01.01.135, 4/5/00; 40 CFR 70.6(a)(3)(iii)]

***Permit Revision Not Required***

- 14.26 No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit.  
[IDAPA 58.01.01.322.05.b, 4/5/00; 40 CFR 70.6(a)(8)]

***Emergency***

- 14.27 In accordance with IDAPA 58.01.01.332, an emergency as defined in IDAPA 58.01.01.008, constitutes an affirmative defense to an action brought for noncompliance with such technology-based emissions limitation if the conditions of IDAPA 58.01.01.332.02 are met.  
[IDAPA 58.01.01.332.01, 3/19/99; 40 CFR 70.6(g)]

## **APPENDIX A**

**The Amalgamated Sugar Company, Paul**

**Process Weight Input Calculation**

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